///Incia Environmental Prol Division of Land Politic



RCRA INSPECTION-REPORT

USEPA #:	~ ~ ~	<u> </u>	5-25		IEPA #:	03116	20	00	Z
Facility Name:	HERITAG	SE ENV	IRONMEN	UTAL SE	RVICES		P) 739-		·
Street Address:						County: Cook		<u></u>	
City: LEMON	Т				State	: ILLINOIS I	Zip: 604	39	
Region: MAY	UDOD	Inspec	tion Date:	7		From: <u>9:00</u> 4	<u>'m</u> To:	12:00	<u> </u>
Weather: (00°						RECEIVED JUL	3 0 1993		
			איז	PE OF FACI	WTY	RECORD CENTER	1 100 2	• •	
Notified As: G	TR. T.S. U	UAF. OSF.	SOF		Regulated	As: G, TR, T, S, W	AF, OSF	SOF	1
LDF?	No HPV?	Uρ	90-Day F/	U Required	n:	YES	NO	V	
,			TYP	E OF INSPI	ECTION	 			
CEI: V	. Sempling:		_ Citizen	Complaint:		Closed:	- Other:		;
CME/O&M:	Reco	rd Review:		_ Follow-4	Up to Inspe	ction of:	Withdrawa	#	
		 	MON	REGULATE	D STATUS	NA			
SQG:		Claimed N	onhandler:		<u> </u>	Other (Specify in Na	rative):		
				PARTA					
No	tification Da	te: <u>8</u> /	19 1 80	, from (l <u>ni</u>	tial) or (sut	sequent) Notification			
initial Part A De	te:/	12181				nended: 12 8			
Part A Withdran	val requeste	d:/	/_	•	Apı	proved by (US)(IL) EF	A:/.	/_	
	 		PART	B PERMIT	APPLICATION	ON			
Part B Permit Sui	bmitted: Y	or N	11 10	188	F	inal Permit Issued:	1	1	
				NFORCEME					
Has the firm been	referred to					411185		<u>-,</u>	
Illinois Attorney G			1 1			ttorneys Y or (N)	1_1		
	···			ADERS ISS	· <u>·</u>				
CACO: 4	1118	ξ	CAFO:	9126	185	Consent Decree:			
Federal Court Ord		1	State Cou		1	IPCB Order:		_/	
								=-==	<u></u>
				AUIT AGIN	VITY SUMM				
A satuta da .		STAT PORTE	COLDEGE SOL	SWI COL	DA DATE	ed vac? Exempt per 35 IAC, Sec.	/6	on Annual	Report
Activity by Process Code	ONF	HCM Y	AS S HON PE	of Dores	39879	Exempt per 35 IAC, Sec.	1992	19 9/	19 90
501	YES	No	YEX	No	YES	MA	YES_	JES	VES
502	YES	No	YES	No	YES	MA	Yes	YES	YES
Tol	YES	,	1	No		W)	Yes	Yes	YES
		No	YES		YES	N).		No	
T04	YES	No	YES	No	No	RECEIVED	No	100	No
							ļ		-
···						- 8 APR 1991	<u> </u>		<u> </u>
						IEPA/DLPO	l		
L 532-1834		·							

Name METROPOLITAN WATE	~ Nece, Did		AGE ENVIRONMENTAL SE						
Address 100 EAST ERIE	STREET	Address (I _{ANA}	L BANK ROAD, NE						
City C'HICAGO		City LEMONT	<u>. </u>						
State / LLINOIS Zi	P GOGII	State LLINOIS							
Phone # (3/2) 675-809		Phone # (708) 739-1151							
PERSON(S) INTERVIE	WED	TITLE	PHONE #						
BOB GARCIA		PLANT MANAGER	(708) 739-1151						
INSPECTION PARTICI	PANT(S)	AGENCY/TI	TLE PHONE #						
DONNA CZECH		IEPA IEPS	(708)531-59						
PREPARED BY	,	AGENCY/TI	TLE PHONE #						
	······································								
DONNA CZECH	<u> </u>	IEPA PERS	(708)531-590						
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OWNER

OPERATOR

IL 532-1835 LPC - 335 (12/89) Page 2 Facili ame: HERITAGE ENVIRONMENTAL SERVICES
USEPA #: IL D 0 8 5 3 4 9 2 6 4

WASTE DISPOSITION FORM

IEPA #: 0 3	11620	0 0	7				_			rui	<i>'1///</i>		
Hese Here included to the second seco	de hat so descritation. Doon of the Constitution of the Constitut	Coses Have	Part of Land	Are Held	n Brown of	יייים אייים איים אייים איים אייים אייים אייים אייים אייים אייים אייים אייים אייים אי	02/		(Circ	On Ann Report fo cle if pres t if not pi	or: sent;	d Constitution	Merite sed Stripteent Disposition
HAZARDOUS WASTE FUEL	PRODUCED FROM IGNITABLE H.W.+ N-H WASTE OIL	3-27-93	DOG1-43	YES	YES	@ /	G F	F	G) /	120,000 gallons	labbany)	3-27-93 \(\su\)	CONTINENTAL CEMENT :" HANNIBAL, MISSOURI FOR SECONDARY FUELS
WASTE PETROLEUM NAPHTHA	PARTS WASHERS	KNOWLEDG OF WASTE	, , , ,	UES	YES	v	© €	F	© F	None	approx. 150 gol./	\$	BLENDED WITH H.W. PUEL ON SITE
WASTE FLAMMABLE SOLIDS	SOIL PROM REMED.		F001- F005- D001	TES	U _{IES}			(F)	⑤ €	2,000 pounds	approx. 225,000 llos. year	3-23-93 ADWAS-TX)	ROLLINS ENVIRONMENTAL IN BATON ROUGE, LOUISIAMA FOR INCINERATION
LAB PACKS	FROM OFF-SITE CLEAN-UP PROJECTS	NO AWAYSIS INVENTORY SHEETS	NARIES	Yes	les			(F)	© / (F	1,000 gol	approx. 20,000 pl. Ap. trantment Thomas 165. lyr. In Contration	3-23-93 (GUSCO)	TRADE WASTE INCINERATION IN SAUGET, ILLINDIS for INCINERATION
LISTED HAZARDOUS WATER	WATER PROM OFF SITE	QA/QC (in bound) shipments	VAKIES	Yes	YES	G	E /	E	© /	MIXED WITH H.W. FUELS	approx. 5,000 gallens	3-27-93 (KS)	ADDED TO H.W. FUEL WHICH GOES TO OFF-SITE INCINERATION
WASTE RECEIVED FOR TEMPORARY STORAGE	NOT TREATED	QA/QC Inbound shipments	VARIES	JES	Yes	<u> </u>		E	Q	25,000	epprox. 50,000 gal./	3-19-93	HERITAGE ENU. SERVICES () IN INDIANAPOUS, INDIANA POR TREATMENT
		, 				<u> </u>	G F	F	<i>x</i>		/		
		ļ				<u> </u>	G F	F	<u> </u>				
					ļ	<u> </u>	G F	F	<i>x</i>				
						G	F G	F	G F				

^{*} All "NO" responses must be explained in narrative.

0311620007 - Cook County Lemont/Heritage Environmental Services ILD085349264

NARRATIVE

Heritage Environmental Services (HES) is currently operating three divisions at the Lemont facility. The first of these is the Treatment Plant which includes the storage and treatment of The second division is Petroleum Management, hazardous wastes. whereby HES picks up waste oil from off-site generators on a multistop permit. The transportation operations at HES are a part of the Petroleum Management division. The third division is Crystal Clean, a parts washer service that began operations in May 1992. Crystal Clean provides virgin solvent (mineral spirits) and parts washer units to its customers. The spent solvent, which is exempt from regulation as a solid waste, is returned to Heritage where it is stored on site in a dedicated tank (VRT-4). Once a month the solvent is shipped off site by tanker truck to Trumbull Asphalt for use in the manufacture of a roofing compound.

HES accepts industrial oils such as crankcase and lube oils, as well as coolants and lubricants from off-site generators. In the oil treatment process, on-spec waste oil fuel is shipped off site to several facilities such as Enjet/Gatx in Argo, Illinois and Apex Oil in Forest View, Illinois. Off-spec waste oil fuel is shipped to Inland Steel in Gary, Indiana. The residual water and the rag layer (oil/water) are shipped to HES in Indianapolis, Indiana for treatment. Any oil fuel which does not meet specifications is sent to HES in Indiana for treatment.

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is sent to be burned as hazardous waste fuel if it has BTU value. The non-hazardous waste is shipped to HES in Indiana for treatment.

Inks, paints, and solvents are accepted at this facility for hazardous waste fuel blending. Hazardous waste fuel with acceptable BTU value is shipped to cement kilns such as Continental Cement in Hannibal, Missouri or to TWI in Sauget, Illinois for incineration. Residual sludge and strainer cleanings from this process are shipped to an off-site incinerator as hazardous waste.

HES also accepts drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes and other inorganic wastes. These wastes, along with heavy hazardous waste fuels which cannot be treated on site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These materials are shipped off site for incineration or treatment after repackaging on site. Steel drums are unpacked and the contents placed in fiber drums prior to shipment off site for incineration. Solvents and fuel materials are bulked and put into supplemental fuels on site. Acids and caustics are bulked into drums and shipped to HES in Indiana for treatment. Other inorganic wastes are shipped directly to HES in Indiana for treatment. Pesticides, oxidizers and some other wastes are shipped directly to an off-site incinerator.

Steel drums are cleaned and crushed on site for eventual shipment off site as scrap metal. Plastic drums which are RCRA-empty are ground up on site and shipped to an off-site facility where the plastic grindings are put into asphalt.

The drum storage and processing building began operations in December 1991. This building is used for all types of container handling including: drum storage; repackaging incinerable solids; de-packing lab packs; high speed dispersion; and housing the drum processing unit and the aerosol can crusher. Material from household hazardous waste collections is handled in this building as well as any type of bulking material into drums.

The aerosol can crusher began operations in December 1992. This unit crushes aerosol cans and recovers the product from the cans. The recovered liquid products are blended into hazardous waste fuels on site. The propane and butane propellants are burned as pilot gas in the boiler on site. The boiler is exempt from BIF regulations because the propellants are fuels and not waste materials.

The drum processing unit is currently in a start-up phase. The unit is a totally enclosed system which is intended for use in fuel blending. Material is augured out of a drum and then conveyed to a dispersion tank. Here the material is circulated with liquid fuel and passed through intermediate and fine grinders. The result is a pumpable slurry. The drum processing unit is intended to replace the high speed dispersion unit which is currently in use.

Hazardous Wastes Generated

- 1. Hazardous Waste Fuel (F001-F005, K086, D00X)
 - produced from ignitable hazardous waste and non-hazardous waste oil
 - approximately 100,000 gallons are generated in a month
 - shipped to Continental Cement in Hannibal, Missouri (cement kilns) or to TWI in Sauget, Illinois (incineration)
 - 120,000 gallons were on site
- 2. Waste Petroleum Naphtha (D001)
 - from two parts washers
 - approximately 150 gallons are generated annually
 - blended into hazardous waste fuel on site
 - none currently on site
- 3. Waste Flammable Solids (D001, F001-F005)
 - used spill pads; contaminated soil from off-site remediation projects; strainer cleanings from secondary fuel blending
 - approximately 225,000 pounds are generated annually
 - shipped to Rollins in Baton Rouge, Louisiana, ENSCO in Eldorado, Arkansas, or TWI in Sauget, Illinois (incineration)
 - 2,000 pounds were on site
- 4. Lab Packs (various EPA waste code numbers)
 - waste accepted from off-site generators and not treated on site
 - approximately 20,000 gallons are generated annually for treatment and 40,000 pounds are generated annually for incineration
 - shipped to HES in Indianapolis, Indiana (treatment) or to TWI in Sauget, Illinois, ENSCO in Eldorado, Arkansas, or Rollins in Deer Park, Texas (incineration)
 - 1,000 gallons were on site for treatment and 2,000 pounds were on site for incineration
- 5. Listed Hazardous Water (various EPA waste code numbers)
 - hazardous wastewater accepted from off-site generators
 - approximately 5,000 gallons are generated every six months
 - blended with hazardous waste fuel on site and shipped to TWI in Sauget, Illinois (incineration)
 - volume mixed with hazardous waste fuels on site

- 6. Waste Received for Temporary Storage (various EPA waste code numbers)
 - inorganic hazardous waste not treated on site
 - approximately 50,000 gallons are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 25,000 gallons were on site

Non-Hazardous Wastes Generated

- 1. Waste Solids
 - non-hazardous tank bottoms; soil from off-site remediation projects
 - approximately 60 cubic yards are generated annually
 - shipped to CID Landfill in Calumet City, Illinois (disposal)
 - 15 cubic yards were on site
- 2. Waste Oil and Oil/Water Mixtures
 - non-hazardous waste oil which cannot be treated on site
 - approximately 1,000,000 gallons are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 21,000 gallons were on site
- 3. Treatment Water
 - reaction water from the separation of waste oil and water
 - approximately 750,000 gallons (including containment water) are generated annually
 - shipped to HES in Indianapolis, Indiana (treatment)
 - 23,000 gallons were on site
- 4. Crushed Drums
 - empty metal drums crushed by a hydraulic compactor on site
 - approximately 800 cubic yards are generated annually
 - shipped to Omni Source in Fort Wayne, Indiana (reclamation of steel)
 - 30 cubic yards were on site

<u> Hazardous Waste Units</u>

- 1. S01 Container Storage
 - diked concrete storage pad
 - 12 locked semi-trailers
 - container storage/processing building

- 2. S02 Tank Storage
 - tanks are located in a tank farm with a concrete floor and concrete walls
 - VRT 1 VRT 4: initial vacuum receiving tanks
 - CB 1 CB 4: cone bottom gravity separation tanks
 - SF 1 SF 7: product storage tanks
- 3. T01 Treatment in Tanks
 - heat treatment and chemical separation occur in tanks
 - tanks are located in a tank farm with a concrete floor and concrete walls
 - HT 2 HT 5: heat treatment tanks
 - HT 1: recycled fuel oil
- 4. T04 Treatment in Containers
 - not occurring at the time of this inspection

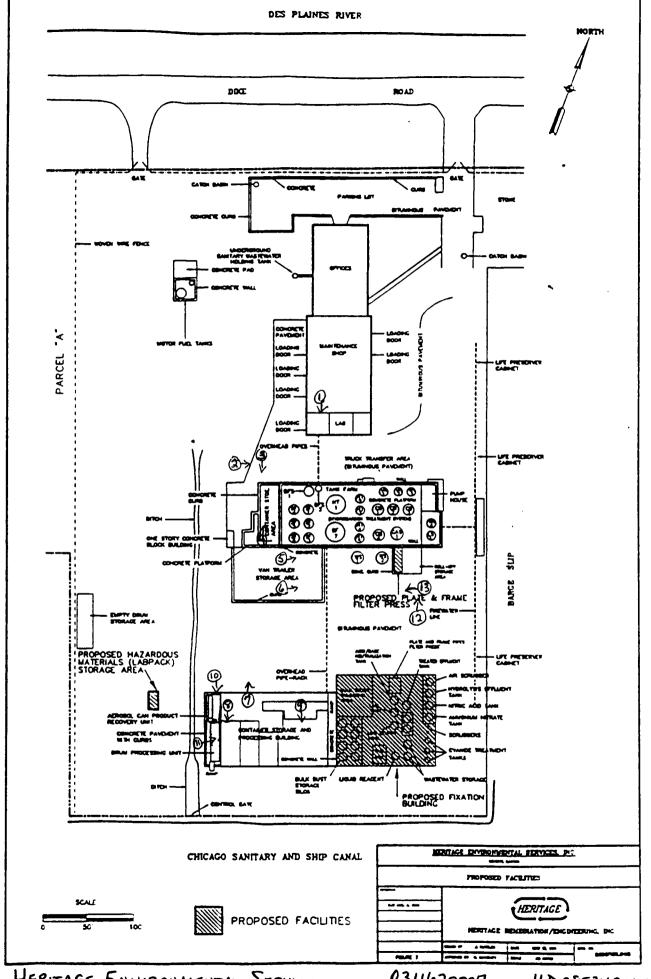
<u>Notes</u>

Two satellite accumulation areas were observed during this inspection. One area was near the aerosol can crusher unit. A drum is kept in this area to contain off-spec aerosol cans. The other area is near the drum processing unit where used spill pads, dirty rags and other bulky materials are placed in containers.

Fiber packs which contain hazardous wastes destined for incineration are accumulated for less than 90 days in a van trailer located on the north side of the drum storage building. These containers are held until an economical shipment is gathered and then shipped to Rollins in Louisiana for incineration.

Heritage Environmental Services is currently operating as a generator, transporter, treatment and storage facility, and marketer of hazardous waste fuels and spec and off-spec used oil fuels. At the time of this inspection this facility was apparently operating in compliance with the applicable RCRA regulations.

DC:dfa:pgb



HERITAGE ENVIRONMENTAL SERVICES

0311620007

1LD085349264

site Name: Heritage Environmental Services

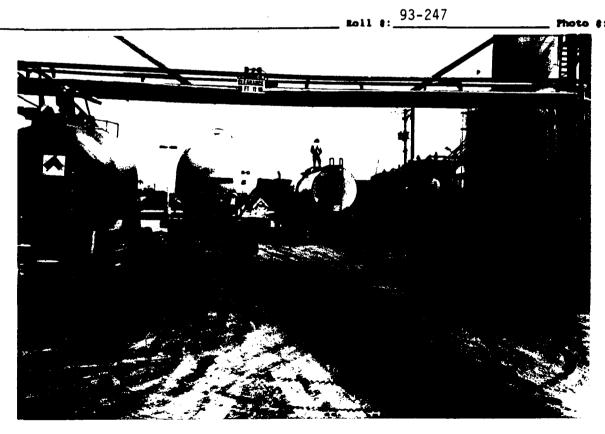
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Date: March 30, 1993 :ime: 9:00am - 12:00pm

tograph By: D. Czech



PARTS WASHERS IN MAINTENANCE AREA

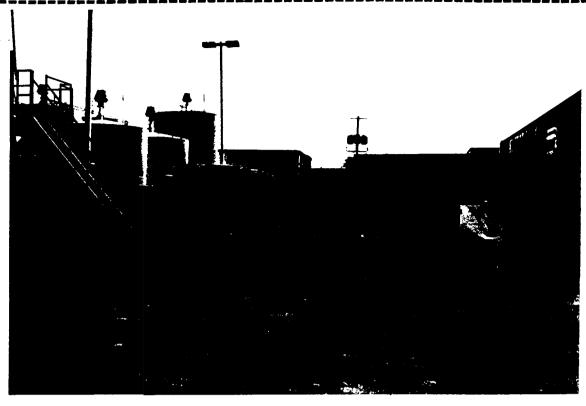


FACING EAST: TRUCK TRANSFER AREA

Roll #: 93-247

site Name: Heritage Environmental Services

Date: March 30, 1993 Time: 9:00am - 12:00pm Photograph By: D. Czech



COMMENTE: FIFCING SOUTH! CONTHINER STORAGE AREA, TANK FARM IS VISIBLE ON

THE LEFT. BOIL 8: 93-247 Photo 8: 3



FACING NORTH: CONTAINER STORAGE AREA

Boll 0: 93-247

Photo #:___

:ZPA 4: 0311620007

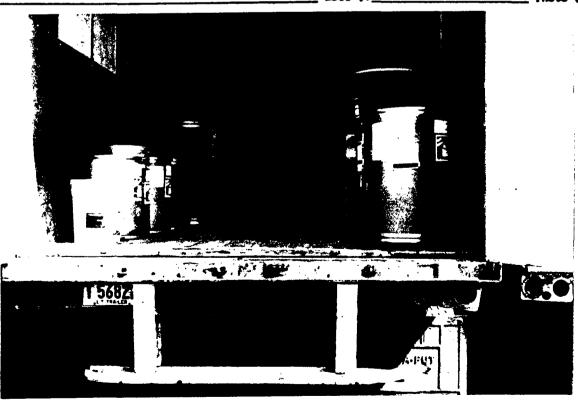
Site Name: Heritage Environmental Services :EPA 6: 0311620007

Date: March 30, 1993 Time: 9:00am - 12:00pm Photograph By: D. Czech



COMMENTE: FACING EAST: VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS

WASTE. 8011 8: 93-247 Photo 8: 5



COMPANING EAST: VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS

WASTE. 2011 8: 93-247 Photo 8: 6

Site Name: Heritage Environmental Services :2PA 8: 0311620007

Date: March 30, 1993 Time: 9:00am - 12:00pm Photograph Sy: D. Czec



COMMENTE FACING NORTH! VIEW INSIDE VAN TRAILER CONTAINING HAZARDOUS

WASTE ACCUMULATED FOR LESS THAN 90 DAYS. 2011 0: 93-247

Photo 8:___



FACING SOUTH: FLAMMABLE STORABE BAY IN THE CONTAINER STORABE

PROCESSING BUILDING

2011 4: 93-247

. Photo 1:_

Site Name: Heritage Environmental Services

:EPA 0: 0311620007

Dete: <u>March 30,</u> 1993

71m: 9:00am - 12:00pm

hotograph By: D. Czech

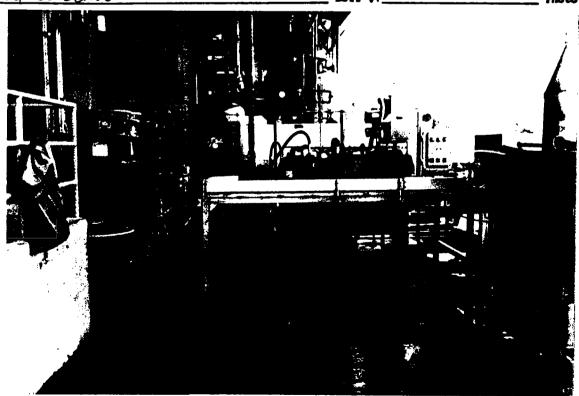


COMMENS: FACING SOUTH: NON-FLAMMABLE STORAGE BAYS IN CONTRINER STORAGE

PROCESSING BUILDING

Boll 0: 93-247

Photo #:_



FACING SOUTH: HEROSOL CAN CRUSHING UNIT (FOREGROUND), SATELLITE

ACCUMULATION DRUM ON THE LEFT.

2011 8: 93-247

Maso: Heritage Environmental Services

:EPA 0: 0311620007

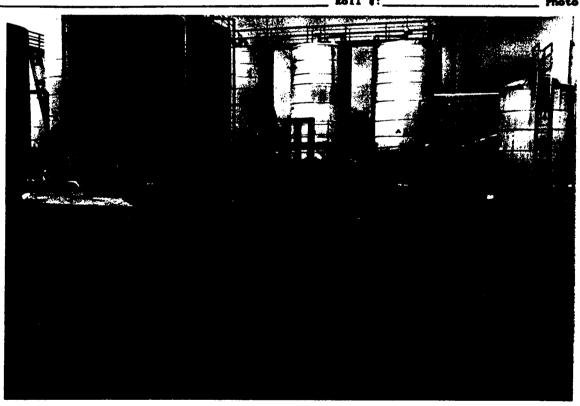
March 30, 1993 71mo: 9:00am - 12:00pm

raph sy: D. Czech



COMMENTE: FACING EAST: SATELLITE ACCUMULATION PRICA NEAR THE DRUM PROCESSING UNIT

Roll 0: 93-247



FACING NORTH! ROLL-OFF BOXES CONTAINING NON-HAZARDOUS WASTES

2011 e: 93-247

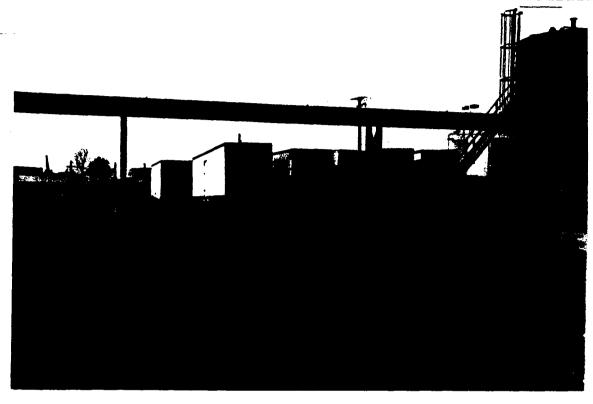
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sice Name: Heritage Environmental Services

:EPA 4: 0311620007

Date: March 30, 1993 Time: 9:00am - 12:00pm

D. Czech



*** FACING WEST: VAN TRAILER CONTAINER STORAGE AREA

2011 8: 93-247

/3

coments:		
	8011 #: 93-247	Moso I:

REVISION 1 (8/15/88)

								KEA1210H T (8) 12\00)
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Regurement		oparent oliance? No	Not Applicable	Remarks or Comment (4)
ОТН	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste?	V			
ОТН	1		a	Yes No Did the generator follow the procedures specified in this section in making its determination? Yes No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number?	V			
				Has the generator obtained a DSEPA Identification number: Yes No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes No				

		<u> </u>			, 	,	- 231	
Arca	Class	90 Day F U Req	Key Ltr Sub Sec	Regurement		parent bliance? No	Not Applicable	Remarks or Comment No
MAN	2		a	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check note: If the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No N/A			2	WASTE ALWAYS DELIVERED TO THE DESIGNATED FACILITY

Ares	SS Da Da F U Re	ง บั	Cey Ltr Sub Sec	Requirement	Comp	parent liance?	lot Applicable	Remarks or Clarolest No.
MAN MAN		U seq s	Sec	Section 722.121: Acquisition of Manifests Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? Or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)? Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes No 2) Obtained the handwritten signature and the	Yes		Not App	INDIANA MISSOURI ARKANSAS LOUISIANA
				date of acceptance by the initial transporter? Yes No				

$\overline{}$			<u></u>		Υ			
Area	Cless	90 Day F/U Req	Ltr Sub	Requirement	Comp	parent liance?	₹	Remarks or Comment No
}		1984	Sec		Yeş	No	No	
			b c	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes \(\subseteq \) No \(\subseteq \) 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes \(\subseteq \) No \(\subseteq \) NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest \(\subseteq \)s. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes \(\subseteq \) No \(\subseteq \) Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes \(\subseteq \) No \(\subseteq \subseteq \) N/A \(\subseteq \) Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes \(\subseteq \subseteq \subseteq \) N/A \(\subseteq \subs				NO SHIPMENTS BY WATER OR RAIL

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent bliance?	Not Applicable	Remarks or Comst ent No
ОТН	1	X		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging		√	NO WASTE READY FOR TRANSPORTATION
	-	^		Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			OFF STIE
нто	1	X		Section 722.131: Labeling	 	1	
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			
ОТН	1	Х		Section 722.132: Marking	 		
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No			
			ь	Is each package of hazardous waste which is ready for transportation off-site marked with:			
				- The generator's name and address? Yes No			
				- The manifest document number associated with the container? Yes No			
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance ⁷ No	Not Applicable	Remarks on Curnment No
отн	1	Fυ		Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip	i '			FIBER PACKS DESTINED FOR INCINERATION ARE ACCUMULATED IN A TRAILER FOR LESS THAN 90 DAYS
				to Section 725.291 of the Generator checklist.				

Area	Cless	90 Day F U Req	Key Ltr Sub Sec	Requirement	In App Compli Yeş	Not Applicable	Remarks or Comment No.
ОТН	1	FÚ	al a2	Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? and/or For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes		⋖	Remarks or Comment No.

							·	
Araa	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or comment No
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes V No N/A Compatibility of Waste with Container (Section 725.272) Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes No Management of Containers (Section 725.273) Are containers of hazardous waste always closed during storage? Yes No Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No Inspections (Section 725.274) Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes No NOTE: Any evidence of leakage may be a reason to answer No to the above question, even if there are inspection records that indicate that inspections are being done.				
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Are 3	SS SS	Day F U	Ltr	Requirement	In Ap	parent liance?	pplica	Hernarks or Comment No
		Req	Sub Sec		t	No	Not A	
				Special Requirements for Ignitable or Reactive Wastes (Section 725.275)			 	
				Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes No N/A			3	
				Special Requirements for Incompatible Wastes (Section 725.277)			1	
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes V No N/A				
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Area	Class	90 Day F'U Req	Key Ltr Sub Sec	Requirement	Comp	parent bliance? No	Remarks or Comment No
			a3	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes No N/A For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes No Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below: Maintenance and Operation of Facility (Section 725.131) Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface Water, which would threaten human health or the environment? Yes No			SEE TSB CHECKLIST

1	90 Day F*U Req	Sub	Requirement	Comp	parent iliance?	¥ ¥	flicinarks or Comment No
		c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes No N/A - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes No 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes No 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes No - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent bliance?	Not Applicable	Remarks or Comment No
				Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes No Are the containers with the excess amounts marked with the date accumulation began? Yes No During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes No			2	NO EXCESS ACCUMULATION

Area	Cless	90 Day f U .	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Consident No
	<u>'</u>	Req	Sec		Yeş	No	No	
ОТН	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes No				
			b	- A copy of each annual report? Yes No				
			b	- A copy of each exception report? Yes No N/A				NONE REQUIRED
			С	 Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A 				
			đ	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A				NO UNRESOLVED ENFORCEMENT ACTION
			đ	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes No N/A				ND REQUESTS FROM THE DIRECTOR

OTH 2 Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site mustialso submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266. MAN 1 Bection 722.142: Exception Reporting A Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste?
b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and

Area	Cless	90 Day F U Req	Key Ltr Sub Sec	Requirement		pparent pliance?	<	Remarks or Comment No
ОТН	1			- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A Section 722.143: Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?	ł		Not Api	NONE REQUIRED

Aras	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent bliance? No	Not Applicable	Remarks or Comment No
ОТН	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.			>	NO EXPORTS OF HAZAR DOUS WASTE

	, 		- 1					
•		90 Day	Key Ltr	Requirement		parent bliance?		Remarks or Comment No
`		Req	Sub Sec	·	Yeş	No		
MAN	3 1	F/U	b1 b2	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and Has the importer or his agent signed the manifest in place of the generator; and Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A Is the person importing hazardous waste using manifests obtained from the Agency? Yes No No			Not Appl	NO IMPORTS OF HAZARDOUS WASTE

PART 722 GENERATOR STANDARDS Subpart 6: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 111. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 111. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).						.		
PART 722 GENERATOR STANDARDS Subpart 6: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the	Area	Class	Day F U	Ltr Sub	Requirement	Comp	liance?	 Remarks or Comment No.
	ОТН	2			Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the	Yeş	No	NO FARMING

Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		perent liance? No	Not Applicable	Remarks or Comment No
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General				
				Section 723.110: Scope				
				Has the firm ever transported hazardous waste into the United States from abroad? Yes No				
				Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes No				
				NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
нто	1			Section 723.111: USEPA Identification Number	V			
			a	Has the transporter obtained a USEPA identification number?				
нто	1	Х		Section 723.112: Transfer Facility Requirements	V			
				Has a transporter of hazardous waste stored manifested shipments of such waste:				
				- For a period of 10 days or less? Yes No <u>✓</u>				

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Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent diance?	Not Applicable	Remarks or Comment No
				 Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes No 	,			
				NOTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.				

PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping Section 723.120: The Manifest System Aprior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USSPA from the USSPA fr			 Key				\$	
PART 723 STANDANDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS MASTE Subpart B: Compliance with the Manifest System and Recordkeeping Section 723.120: The Manifest System Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No C Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport?	8 . 4	See		Requirement			1 2	Remarks or Comment No
STANDARDS APPLICABLE TO TRAMSPORTERS OF HAZARDOUS MASTE Subpart B: Compliance with the Manifest System and Recordkeeping Section 723.120: The Manifest System Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No C Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport?			l .		Yeş	No	Not A	
a Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No C Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport?				STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and				
a Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No C Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport?	MAN	1/2		Section 723.120: The Manifest System			<u>ب</u>	MANIFECTS FOR
d Has the transporter who delivers hazardous waste to another transporter or to the designated facility:			b	has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes No				TRANSPORTATION ARE KEPT AT THE HES

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	oparent oliance? No	Not Applicable	Remarks or Comment No
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes No				
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes No				
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes No				
			е	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes No N/A				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes No N/A				
			g	Has the transporter who transports hazardous waste out of the United States:				
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes No				
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes No				
			! ! !					

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Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	operent olience? No	Not Applicable	Remarks or Comment No
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes No 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes No Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes No NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes No AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND			V	Crystal Clean operation uses reclomation agreements (exempt waste) NOT RERA- REGULATED
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3) All shipping information required by U.S.D.O.T; AND 4) The date the waste is accepted? Yes No AND Does the transporter carry this record when transporting waste to the reclamation facility? Yes No AND Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes No Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to: 1) The designated facility on the manifest?	AND 4) The date the waste is accepted? Yes No AND Does the transporter carry this record when transporting waste to the reclamation facility? Yes No AND Does the transporter retain these records for a period of three years after termination or expiration of the agreement?
OR 2) The alternate designated facility if the hazard- ous waste cannot be delivered to the designated facility because an emergency prevented de- livery? Yes No N/A	Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to: 1) The designated facility on the manifest? Yes No OR 2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented de-

To T	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	operent Hience? No	Not Applicable	Remarks or Comment No
ОТН	2			3) The next designated transporter? YesNoN/A OR 4) The place outside the United States designated by the generator? YesNoN/A NOTE: A "No" answer can still be in compliance. In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? YesNoN/A Section 723.122: Recordkeeping Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? YesNo Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? YesNoN/A Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? YesNoN/A			✓	MANIFESTS ARE KERT AT HES IN INDIANAPOUS, IN NO SHIPMENTS BY WATER OR RAIL

Arae	Class	90 Day F.U Req	Key Ltr Sub Sec	Requirement	Comp	perent liance? No	Not Applicable	Remarks or Comment No
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes No N/A				NO SHIPMENTS OUTSIDE THE U.S.
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes No N/A OR				NO UNRESOLVED ENFORCEMENT ACTION
			е	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes No N/A				NO REQUESTS BY THE DIRECTOR

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₽₩ •	Class	90 Day	Key Ltr	Requirement		parent pliance?	policable	Remarks or Comment No
	Ū	F/U Req	Sub Sec	, and the second	1	No	tot A	nemarks or comment iso
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges			2	
отн	1			Section 723.130: Immediate Action			¥	NO SUCH INCIDENTS
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes No				HAVE OCCUERED
			С	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes No				
отн	1	X		Section 723.131: Discharge Clean-Up			~	No such incidents
				After a discharge of hazardous waste did the transporter:				HAVE OCCURRED
				- Clean-up the discharge? Yes No				
	!			- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status				
ОТН	1			Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	V			
			a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes No N/A				
				2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes No N/A				
				3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A				

Aras	Ciess	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or Comment No
ОТН	1			Section 703.151: Application by New HWM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has			✓	NOT A NEW FACILITY
				Commenced? Yes No Is the facility only operating with a RCRA permit? Yes No				
ОТН	1			NOTE: This violation should be cited in the CIL only after receiving approval from headquarters. Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim	V			
				status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes				
				2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				

Are.	Ciass	90 Day F/U Req	Ltr Sub Sec	Requirement		parent liance? No	Vot Applicable	Remarks or Comment No
OTH	1	Day F/U	Ltr	Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No - Employing processes not specified in Part A of the permit application? Yes No - Exceeding the design capacities specified in Part A of the permit application? Yes No Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes No N/A	Comp	liance?	Not Applicab	NO CHANGES IN OWNERSHIP OR OPERATIONAL CONTROL

Area	(.lass	90 Day F Li Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent liance?	Not Applicable	Remarks or Comment No
ОТН	1		đ	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes No N A				THESE WASTES ARE NOT MANAGED BY THIS FACILITY

Area	Ciass	90 Day F U Req	Ke, Ltr Sub Sec	Requirement	Comp	parent liance?	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
ОТН	1		:	Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<u> </u>			
ОТН	1			Section 725.112: Required Motices			V	
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				NO WASTE RECEIVED FROM A FOREIGN SOURCE
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A				NO TRANSFER OF OWNERSHIP OR OPERATION
ОТН	1		al	Section 725.113: General Waste Analysis Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No	<u>\</u>			

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Area	(.lass	90 Day F U	Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	140	Š	
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No				
			a 3	Has the analysis been repeated:				
				A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed?				
				Yes No N/A				
				B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A				
			b	Has the owner or operator developed a written analysis plan? Yes No				
				<u>NOTE</u> : If "No", skip to 725.114.				
				Is the written waste analysis plan available at the facility? Yes No				
				159 <u>A</u> HO				

Area	Clica	90 0av Fe0	Key Ltr Sub Sec	Scourement (Comp	parent Earce	Not Applicable	Remarks or Comment No
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No				
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes No 2) The test methods which will be used to test for those parameters?				
				Yes No 3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No	2			
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No				

Area	Class	90 Day F U Rea	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1	X	С	6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.474 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes No N/A Section 725.114: Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes 10 10	<u>✓</u>			

		_	· · · · ·	<u> </u>			A)	
Area	1455	90 Day	Key Ltr	Requirement		parent liance	Applicable	Remarks or Comment No
4	,	F (' Rea	Sub Sec	•	Yeş	No	Not A	
		Rea		Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No OR 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes No Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words	Yes	No	Nor	
				"Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes No NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.				

							· -	
Area	Class	90 Dav F U Req	Key Ltr Sub Sec	Requirement		pparent pliance?	Not Applicable	Remarks or Comment No
ОТН	2			Section 725.115: General Inspection Requirements	V	1_		
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				 Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes No 				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No				
			b2	Is the written schedule at the facility? Yes No				
			ь3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes No				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				 Daily inspections of areas subject to spills? Yes No 				
L					\perp		<u> </u>	

Area	(,185\$	90 Day F U Req	Key Ltr Sub Sec	Requirement	Comp	parent bliance? No	Not Applicable	Remarks or Comment No
			c đ	- The items and frequencies, where applicable, called for in Sections:				

Area	Class	90 Day F U	Key Ltr	Requirement		parent pliance?	pplicable	Remarks or Comment No
		Req	Sec		Yeş	No	Not A	
				 A notation of the observations made? Yes No The date and nature of any type of corrective action? Yes No N/A 				
ОТН	2			Section 725.116: Personnel Training	V			
				Does the facility have a training program? Yes No				
				NOTE: If "No", skip to Section 725.117, Page TSD-B-10.				
			al	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No				
				Is the training program formalized, i.e., written down? Yes No				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes No				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes No N/A				

Area	Class	90 Day f Li Req	Key Ltr Sub Sec	Requirement		parent lliance?	Vot Applicable	Remarks or Comment No
		Нед	b	B) Key parameters for automatic waste feed cutoff systems? Yes No N/A C) Communications or alarm systems? Yes No N/A D) Response to fire or explosion? Yes No N/A E) Response to ground water contamination incidents? Yes No N/A Does the program cover the implementation of the contingency plan? Yes No Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A Has the facility conducted an annual review of the initial training? Yes No N/A Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No	Yes	No	NOI	THESE INCUDENTS NOT LIKELY TO OCCUR

Arga	(Jass	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent pliance? No	Not Applicable	Remarks or Comment No
ОТН	1	X	e	2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No 4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes No N/A Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes No Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes No	✓			

Area	Class	90 Day	Key Ltr			parent	Applicable	
Ar	:5 	F U Req	Sub Sec	Requirement .	Yeş		Not Ap	Remarks or Comment No
<u> </u>			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No				
	<u> </u>		b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or compling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No				
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No				
				4) Damage the structural integrity of the device or facility containing the waste? Yes No				
				5) Through other like means threaten human health or the environment? Yes No				
L								

Area	Class	90 Day F U Req	Key Ltr Suh Sec	Requirement	In Ap Comp Yeş	parent bliance? No	Not Applicable	Remarks or Comment No
		Req	Sec	Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A NOTE: A "Yes" answer is a violation of the location standard.	Yes	No	Not	

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				
ОТН	1	X		Section 725.131: Maintenance and Operation of Facility	V			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
				Air;Soil; orSurface water,				
				which would threaten human health or the environment? Yes No				
отн	1	X		Section 725.132: Required Equipment	<u> </u>			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A				
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No 11/A				

Area	Class	90 Dav F U Req	Key Ltr Sub Sec	Requirement	oparent oliance? No	Not Applicable	Remarks or Comment No
ОТН	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No N/A - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes ✓ No N/A			

Лен	(,lass	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1	x		Section 725.134: Access to Communications or Alarm Systems	V			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				
			b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes No N/A				THERE IS NEVER ONLY ONE EM PLOYEE ON THE PREMISES DURING OPERATING HOURS
ОТН	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
ОТН	2		a	Section 725.137: Arrangements with Local Authorities Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Arna	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes No N/A			LEMONT POLICE + FIRE DEPLAREMENTS
			,	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A			LEMONT AUTHORITIES WOULD TYPICALLY RESPOND
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A	•		
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes No N/A			SILVER CROSS HOSPITAL
				NOTE: Any "N/A" answer must be explained in the Comments.			
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes No N/A			NO SUCH INCIDENTS HAVE OCCUPPED

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6.rea	(.lass	Day F U Req	Sub	Requirement		parent liance?	Applicable	Remarks or Comment No
		Hed	Sec		Yeş	No	N _{O.}	
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
ОТН	1			Section 725.151: Purpose and Implementation of Con- tingency Plan	V			
			a	Is a plan available? Yes No				
				NOTE: If the answer is "No", skip to 725.155.				
	:		a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A				
ОТН	2			Section 725.152: Content of Contingency Plan	<u> </u>	1		
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires? Yes No 2) Explosions? Yes No				

90 Key Ltr Day f L' Sub Sec	Requirement	parent hance? No	Not Applicable	Remarks or Comment No
d Does the (office as emerge Yes d Is the li Yes d If more coordinat Yes	Hospitals? Yes No Contractors? Yes No State and local emergency response teams? Yes No plan list the names, addresses and phone numbers and home) of all personnel qualified to act ency coordinators? No ist of emergency coordinators up-to-date? No than one person is designated as an emergency tor is a primary coordinator designated? No plan identify:			

								
Area	Class	90 Day F U	Key Ltr	Requirement		parent liance?	pplicable	Remarks or Comment No
	C	Req	Sub Sec		Yeş	No	Not A	Neviding of Comment No
ОТН	2		e f f a	2) A brief outline of the capability of each piece of emergency equipment? Yes No 3) The location of each piece of emergency equipment? Yes No Is the list of emergency equipment up-to-date? Yes No Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes No N/A Does the plan identify the signal to be used to begin evacuation? Yes No Are alternate evacuation routes identified? Yes No Section 725.153: Copies of Contingency Plan Has a copy (and all revisions) of the contingency plan: a) Been maintained at the facility? Yes No b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon :> provide emergency service? Yes No			2	
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Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		pparent pliance?	Not Applicable	Remarks or Comment No
ОТН	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever:	✓			
			a	 Applicable regulations are revised? Yes				THE PLAN HAS NOT FAILED
			С	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				
			đ	4) The list of emergency coordinators changes? Yes <u>✓</u> No				
отн	2		e	5) The list of emergency equipment changes? Yes No No Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times?	V			
				Yes <u>V</u> No				

Area	Class	90 Day f U Req	Key Ltr Sub Sec	Requirement		parent bliance? No	Not Applicable	Remarks or Comment No
ОТН	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes V NO Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes NO Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes NO NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.	<u>✓</u>			12-11-92: 1 20 gallons of H.W. PUEL REGENSED INTO SECONDARY CONTINUMENT OF DRUM PRICESSING UNIT 12-14-92: 1 30 gallons of H.W. FUEL RELEASED INTO SECONDARY CONTAINMENT OF DRUM PROCESSING UNIT 3-4-93: 1 50 gallons of H.W. FUEL RELEASED INTO SECONDARY CONTAINMENT OF DRUM PROCESSING—UNIT ALL PROPER PROCEDURES FOLLOWED

Area	Class	90 Day F L' Req	Key Ltr Sub Sec	Requirement	In Appare Compliand		Remarks or Comment No
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System			
				Does the facility accept waste from off-site? Yes No NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.		:	
			al	For each manifest reviewed, did the facility: 1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No			
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ✓ No N/A			
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No			
			a 4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No			
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent pliance? No	Not Applicable	Remarks or Comment No
MAN	2		b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes No N/A Does the facility initiate shipments of hazardous waste? Yes No NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist. Section 725.172: Manifest Discrepancies NOTE: If there are no manifest discrepancies, mark the "N/A" column. Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes No If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No N/A	~			NO SHIPMENTS RECEIVED BY WATER OR RAIL DISCREPANCIES ARE ROUTINELY RESOLUTED
L				l	1	1	<u></u>	.

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Area	Class	90 Day	Key Ltr	Requirement	In Apparent Compliance?	Applicable	Remarks or Comment No
	J	Rea	Suti Sec		Yes No	V TON	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
ОТН	2			Section 725.173: Operating Record		-	
			a	Does the owner or operator have a written operating record at the facility? Yes No			
			b	Is the information in the operating record being maintained until closure of the facility? Yes No			
			b	Does the operating record contain the following information:			
				 A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No 			
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes No			
				3) The location of each hazardous waste within the facility? Yes No			
				4) The quantity of each hazardous waste at each location within the facility? Yes No			
				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A			NOT A DISPOSAL FACILITY
	<u> </u>				<u> </u>		

Area	ssel.)	90 Day F U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	. Remarks or Comment No
		Req		6) A cross reference by manifest number to location and quantity of hazardous waste? Yes No N/A 7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes No N/A - 725.293 (Tanks)? Yes No N/A - 725.325 (Surface Imprevenents)? Yes No N/A - 725.352 (Waste Piles)? Yes No N/A - 725.373 (Land Treatment)? Yes No N/A - 725.441 (Incinerators)? Yes No N/A - 725.475 (Thermal Treatment)? Yes No N/A - 725.502 (Chem., Phys., Bio. Treatment)? Yes No N/A 8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156/j)? Yes No N/A	Yes	No	Not	

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	in App Compli Yeş		Not Applicable	Remarks or Comment No
		neq	Sec	9) Records and results of inspection y Section 725.115(d)? Yes No	on inspection or three years. ly be extended taction. cal data where	No	ON	
1		1	<u> </u>					

Área	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	Not Applicable	Remarks or Comment No
отн	2			11) All closure cost estimates required by Section 725.242? Yes No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records	✓			NOT A DISPOSAL PACILITY
			С	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A				NO DISPOSAL FACILITIES NO UNRESOLVED ENFORCEMENT ACTION
								NO REQUESTS BY THE DIRECTOR

Area	(.lass	90 Day F U Req	Key Ltr Sub Sec	Requirement		pparent pliance?	Not Applicable	Remarks or Comment No
ОТН	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	~			
ОТН	1			Does the facility accept hazardous waste from off-site? Yes No NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177. Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions: Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No NO NO NO NO NO NO NO NO NO				

Area	Class	90 Dav F U Reg	Key Ltr Sub Sec	Requirem e nt	Comp	parent liance? No	Not Applicable	Remarks or Comment No
ОТН	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No	Yes	No		NONE REQUIRES

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
CLO	1		a	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts 6 and H: Closure, Post-Closure and Financial Requirements Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection?	√			
				Yes No Was the closure plan submitted to the Agency within the time frames specified below: - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes No N/A				FACILITY IS NOT CURRENTLY GOING THROUGH CLOSURG
				- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A				
				At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A				
				- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
CLO	1			 No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes			\ \	NOT A DISPOSAL FACILITY
			a	Was the most current facility post-closure plan available during the inspection? Yes No Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes No N/A				
FIN	1			Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	V			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".			~	NOT A DISPOSAL FACILITY

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container			_	
ОТН	1	Х		Section 725.271: Condition of Containers	V			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
ОТН	1	X	}	Section 725.272: Compatibility of Waste with Containers	V			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
нто	1	Х		Section 725.273: Management of Containers	/			
			a	Are containers of hazardous waste always closed during storage? Yes No				
			Ъ	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				,
ОТН	2			Section 725.274: Inspections	V			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes No				

								
Area	Class	90 Day F Li Reg	Key Ltr Sub	Requirement	Comp	parent liance?	ot Applicable	Remarks or Comment No
отн	1	X	Sec	NOTE: Any evidence of leakage may be a reason to answer No to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done. Section 725.276: Special Requirements for Ignitable or Reactive Wastes Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Section 725.277: Special Requirements for Incompatible Wastes Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?	Yeş	No	Not	
	~			TCD T O				· · · · · · · · · · · · · · · · · · ·

Area	Class	90 Day f U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
ОТН	2		a	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes No If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No NOTE: Failing the filter test means that the waste contains free liquids. Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.		√	TANKS CONTRAIN LIQUID WASTES AND ARE LOCATED IN AN OUTSIDE TANK MARK TANKS HAVE SECONDARY CONTAINMENT

		20	Key				훒	
Area	Class	90 Day F U	Ltr	Requirement		parent liance?	Applica	Remarks or Comment No
٩	J	Req	Sub Sec		Yeş	No	Not A	TEMPORE OF COMMENT
			b	Does this assessment consider at least the following:				\
				 available standards for the tank and ancillary equipment; 				
				hazardous characteristics of the wastes;				
	'			existing corrosion protection measures;				
				4) age of the tank system; and	ļ			
				5) results of a leak test, internal inspection, or other tank integrity examination? Yes No				\bigvee
отн	1			Section 725.292: Design and Installation of New Tank Systems or Components			✓	NO NEW TANKS
			a	For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No				
				Does the assessment include, at a minimum, the following:				
				 design standards for tanks and ancillary equipment; 				
				NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.				
				2) hazardous characteristics of the waste; and				V
				3) evaluation of potential for corrosion and corrosion protection measures? Yes No				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No		Z	V
ОТН			aî	Section 725.293: Containment and Detection of Releases Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes No N/A			NO NEW TANKS
			a 2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A			THESE WASTES ARE NOT MANAGED
			a 3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A			
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A			TANKS HE OF KNOWN AGE
				or If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A			V
			a 5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A			NO SUCH WASTES ARE MANAGED.

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
			b1 & 2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements		Z	
			c4	given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system). Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A			
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.			
			d	Does the secondary containment have one or more of the following:			
				1) a liner (external to the tank); or2) a vault; or			
				 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes No N/A 			
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.			
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent bliance? '	Not Applicable	Remarks or Comment No
				 above ground piping (exclusive of flanges, joints, valves and connections) that are in- spected daily; 			
				 welded flanges, joints and connections that are inspected daily; 			
				 sealless or magnetic coupling pumps that are inspected daily; and 			' .
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A			
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems:			
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A			NO UNDERGROUND TANKS
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A			
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes No N/A			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance ⁷ No	Not Applicable	Remarks or Comment No
ОТН	1	X		Section 725.294: General Operating Requirements Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes No Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A	✓			manual system currently in place — auto, cut-offs + high-lend olorms to be installed whin a year of the effective classe of the Part B permit NO OPEN TANKS
ОТН	2	X	С	Section 725.295: Inspections Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes No Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems	✓			
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

Area	Class	90 Day f U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
¥	נט	_		If a tank or secondary containment system has leaked, has the owner done the following: 1) Ceased using, stopped inflow of wastes? Yes No 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes No 3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes No 4) Reported to the Agency within 24 hours of detection? Yes No NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was	- 1	Not Ap	RELEASES HAVE ALL BEEN SPILLS INTO THE SECONDARY CONTAINMENT SYSTEM (NO LEAKS)
			e4	5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No			

Area	Class	90 Dav F U	Key Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No.
		Req	Sec		Yeş	No	Not	
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after returning the tank system to use? Yes No N/A				
CLO	1			Section 725.297: Closure and Post Closure Care				NO TANKS GOING
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				THROUGH CLOSURE
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No				
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes No				
			b	If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No				
				NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	In Appa Complia	Not Applicable	Remarks or Comment No
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes	/		
				Are ignitable or reactive wastes stored in tanks? Yes No			
				NOTE: If "No", skip to Section 725.299.	1 1		
		,	a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No			
				NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.			
			ь	Are there proper protective distances between the waste management area and the facility boundary line? Yes No			
ОТН	1			Section 725.299: Special Requirements for Incompatible Wastes		 V	IN COMPAN BLE WASTES ARE NOT STORED IN THE SAME
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A			TANK

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1		a	Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner: 1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A Or 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A NO N/A NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.			SUBSTANTIALLY DIFFERENT WASTES ARE NOT PLACED IN THE SAME TANK

PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC NAZARDOUS MASTE AND SPECIAL TYPES OF HAZARDOUS MASTE MANAGEMENT FACILITIES Subpart D: Hazardous Maste Burned for Energy Recovery recovery (excluding Subpart 0 incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Raterials identified in 721.104 and 721.106(a)(3)(E) through (1), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart. Section 726.132: Standards Applicable to Generators of Hazardous Maste Fuel I a ls the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A Section 726.133: Standards Applicable to Transporters of Mazardous Maste Fuel Is the transporter in compliance with 723 requirements (complete and attach the R checklist)? Yes No N/A Section 726.134: Standards Applicable to Marketers of Mazardous Maste Fuel II a ls the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identifi- and									
STAMDARDS FOR THE MANAGEMENT OF SPECIFIC MAZARDOUS MASTE AND SPECIAL TYPES OF HAZARDOUS MASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart 0 incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (3QG) are exempt from this subpart. Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	Area	Class	Day F U	L Ir Sub	Requirement	Comp	liance?	Not Applicable	Remarks or Comment No
recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (1), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart. Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel I a Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel I Is the transporter in compliance with 723 requirements (complete and attach the IR checklist)? Yes No N/A Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel OTH II a Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A					STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES				
OTH II a Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fue! I Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A OTH X Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fue! OTH II a Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A					recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject				
Complete and attach the GEN or RR GEN checklist)? Yes	ОТН		X		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	V		-	
OTH Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel OTH II a Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A		l		ð	(complete and attach the GEN or RR GEN checklist)?				·
OTH X Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel II Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A	ОТН				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	~			
OTH II a Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A		I			(Complete and attach the TR checklist)?				
to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A	ОТН		Х			~		-	
and	OTH	11		a	to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identifi- cation number?				
					and				

·		,			 		
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes No N/A			
	11		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes No N/A			
	I		С	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes No N/A			
	I		đ	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes No N/A			
	11		е	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes No N/A			
	11		е	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes No N/A			THIS FACILITY DOES NOT ACCEPT HAZARDOUS WASTE FUEL
	11		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes V No N/A			

Area	Class	90 Day F U Req	Key Lir Sub Sec	Requirement	oparent oliance? No	Not Applicable	Remarks or Comment No
нто				Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel		✓	THIS PACILITY DUES NOT BURN HAZARDOUS WASTE
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes No N/A			FUEL
	11		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes No N/A			
	I		С	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes No			
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.			
	I		С	Is the facility in compliance with 722.134? Yes No N/A			
	11		đ	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes No N/A			
	11		е	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes No N/A			

		90	Key Lir			parent	3	
Area	Class	Day F U Req	Sub Sec	Requirement	Comp	liance?	ot Apple	Remarks or Comment No
отн				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS MASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery Has the marketer conducted an analysis of the used oil? Yes No N/A NOTE: If "No", then Subpart E applies. Does the oil exceed any of the specifications listed in 726.140(e)?	Yes	No	0	
	1		b2	Yes No <u>MOTE</u> : If "No", then Subpart E does not apply except for 726.143(b)(1) and (b)(6).				
	11		b3	Has the marketer re-notified USEPA as to used oil management activities? Yes No				
			b4	Does the marketer have an invoice system such that receiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes No				

	-		, .		 		
Are.	Class	90 Day F U Req	Key Lii Sub Sec	Requirement	parent tience? No	Not Applicable	Remarks or Comment No
	11		b5 b6	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes V No Has the marketer provided the same written notice to			
			DO	any other marketer from which waste oil has been received? Yes No N/A			
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes No			
отн				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery		Х	THIS FACILITY DOES NOT BURN USED OIL FUEL
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.			
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes No N/A			
	II		b	Has the proper notification been given to USEPA? Yes No MOTE: Explain your response in the remarks column.			

<u></u>	T-							
Are.	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
	11		c d	any off-specification oil, the one-time signed certification notice? Yes No N/A If the burner blends off-specification oil so that it now meets specifications, have analyses been done? Yes No N/A NOTE: If "No", then Subpart E applies. Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)? Yes No				
1		}			})	1	

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

L General Information	08				
Facility:	He	RITAGE EN	VIRONHEUTA	L SERVICES	<u> </u>
U.S. EPA ID No.:	-			03/1620	0007
Street:	<u>C</u> A	NAL BANK	ROAD, NE		
City:	LE	FMONT	St	sie: <u> </u> Zi	p: <u>60439</u>
Telephone:	(7	08) 739-115	5/		
Inspection Date: Weather Conditions:		Time	= 9:00am-12:0	(am/pm)	
Inspectors:	Nam Do	e Una Czech	Agency/Titl)53/-59 <u>0</u> 0
Facility Representative	es: B	OB GARCIA	- PLANT	YGR. (708) 739-1151
See Appendix B to det	termine which <u>Generate</u>	of the following	LDR waste o	ategories the fa	cility manages: <u>Dispose</u>
F001-F005 Solvents			~	~	
F020-F023 and F026-F028					
California List					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]					

^{*} See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- 1) FUEL BLENDING OF HAZARDOUS WASTES WITH WASTE OILS
- 2) RE-PACKAGING OR RE-MANIFESTING HAZARDOUS WASTES ACCEPTED FROM OFF-SITE GENERATORS

LDR Waste Management:

ALL LAND RESTRICTED WASTES ARE SHIPPED OFF SITE FOR TREATMENT OR INCINERATION.

Summary:

NO APPARENT VIOLATIONS OF THE LAND DISPOSAL RESTRICTION REGULATIONS WERE OBSERVED.

Signature: Donna J. Czech

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

IL WASTE IDENTIFICATION

•	1.	FOOI through FOO5 spent solvents: FOOI TUROUGH FOOS SPENT SOLVENTS					
	2	F020-F023 and F026-F028 dioxin-containing wastes:					
	3.	California List Wastes (See Appendix A): VARIOUS WASTE CODES POSSIBLE					
	4.	First Third Wastes [40 CFR 268.10]: VARIOUS WASTE CODES POSSIBLE					
	5.	Second Third Wastes [40 CFR 268.11]: VARIOUS WASTE DUDES POSSIBLE					
	6.	Third Third Wastes [40 CFR 268.12] .: VARIOUS WASTE CODES POSSIBLE					
	the to by 03, waster	it they are characteristic for a constituent previously covered under the EP toxicity					
	the to by 03, waster	tteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining oxicity characteristic (TC). Small quantity generators must comply with this new requirement /29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" t. They will be required under 40 CFR Part 268 only after they are evaluated by U.S. EPA.					
L	charac the to by 03, waste: even charac	e Code Determination Have all wastes been correctly identified for purposes of compliance with					
1.	the tree to by the tree tree tree tree tree tree tree	eteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining oxicity characteristic (TC). Small quantity generators must comply with this new requirement /29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" in They will be regulated under 40 CTR Part 265 only after they are evaluated by U.S. EPA, lif they are characteristic for a constituent previously covered under the EP toxicity exteristic (55 FR 22531). e Code Determination					
1.	the tree to by the tree tree tree tree tree tree tree	e Code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?					
3.	the tree to by the tree tree tree tree tree tree tree	the ristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining exicity characteristic (TC). Small quantity generators must comply with this new requirement (29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" it. They will be regulated under 40 CFR Part 268 only efter they are evaluated by U.S. EPA, if they are characteristic for a constituent previously covered under the EP toxicity exercistic (55 FR 22531). e Code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes No					
L	the tree to by the tree tree tree tree tree tree tree	the ristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining exicity characteristic (TC). Small quantity generators must comply with this new requirement (29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified is. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, if they are characteristic for a constituent previously covered under the EP toxicity exeristic (55 FR 22531). The code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes					
L	the tree to by the tree tree tree tree tree tree tree	the ristic leaching procedure (ICLP) instead of the extraction procedure (EP) for determining suicity characteristic (IC). Small quantity generators must comply with this new requirement (29/91. Wastes which exhibit IC, but do not exhibit EP, will be considered "newly identified" is. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, if they are characteristic for a constituent previously covered under the EP toxicity steristic (55 FR 22531). e Code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes					

	2.			haracteristic waste code been assigned, where a listed waste 40 CFR 268.9(a)]
		Yes <u>V</u>	No	NA
		Comments		
	3.	Has multi-se	ource leachate	been assigned the F039 waste code?* [40 CFR 261.31]
		Yes	No	NA <u>v</u>
		*Leachate der individual w	rived exclusively este codes.	y from F020-F023 end/or F026-F028 diaxin wastes retains the
		If yes, was s 22623]	ingle-source le	achate combined to form multi-source leachate? [55 FR
		Yes	No	•
		Comments_	·	······································
_	_			
2	Does	the facility ba	ndle the follow	ring wastes (national capacity variances)?
	1.			oil and debris resulting from a CERCLA response action on (expires - 11/08/90). [40 CFR 268.30(c)]
		Yස	No 🗸	List
-	2.			and debris resulting from a CERCLA response action or a expires - 11/08/90). [40 CFR 268.31(b)]
		Yes	No 🗹	List
	3.			d soil and debris resulting from a CERCLA response ive action (expires - 11/08/90). [40 CFR 268.32(d)(2)]
		Yes	No 🗹	List
	4.	К048-К 052 (b)]	petroleum was	tes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35
		Yes	No	List
	5.	incineration K014, K023, K113, K114, P094, P097,	set in the Seco , K027, K028, I , K115, K116, I P109, P111, U	ed with wastes that had treatment standards based on- ond Third rule - F010, F024, K009, K010, K011, K013, K029, K038, K039, K040, K043, K093, K094, K095, K096, P039, P040, P041, P043, P044, P062, P071, P085, P089, 028, U058, U069, U087, U088, U102, U107, U190, U221, 18/91). [40 CFR 268.34(d)]
		Yes	No 🗸	List

6.	Third Third	d rule based on i	ed with wastes that had treatment standards set in the incineration, mercury retorting, or vitrification. See 08/92). [40 CFR 268.35(e)]
	Yes	No_V	List
7.			ters - F039, K031, K084, K101, K102, K106, P010, P011, 087, P092, U136, U151. (expires -05/08/92). [40 CFR
	Yes	No	List
8.	(DODWaster	waters), D008 (k	ified as hazardous based on a characteristic alone: D004 ead materials stored before secondary smelting), D009 - 05/08/92). [40 CFR 268.35(c)]
	Yes	No <u></u>	List
9.		ring EPA Hazaro	fined in 40 CFR 268,2(g)*; includes chromium refactory dous Waste Nos. K048-K052 (expires - 05/08/92). [40
	Yස	No. 1	List
		NO V	
	*Note: Inco		40 CFR 268.2(a)(7)] in Third Third rule.
10.	RCRA haz	rrect reference (40 CFR 268.2(a)(7)) in Third Third rule.
10.	RCRA haz (expires - 0	ardous wastes the 5/08/92). [40 CF	40 CFR 268.2(a)(7)) in Third Third rule.
10. 11.	RCRA haz (expires - 0 Yes Wastes liste	ardous wastes the 5/08/92). [40 CF No	40 CFR 268.2(a)(7)) in Third Third rule. nat contain naturally occurring radioactive materials FR 268.35(c)]

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A.	Treats	bility Group/Treatment Standard Identification®
		This information is generally available on LDE notifications. If not, waste profile data or documentation should be checked.
	1.	F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?
		Yes No NA \
		If available, list each waste code and check the correct treatability group.
		Waste Code Wastewater Nonwastewater Fool Foot
		*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCME. [40 CFR 268.2(f)(1)]
		Comments
	2	F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?
		Yes No NA
		If yes, list each waste code and check the correct treatability group.
		Waste Code Wastewater Nonwastewater
		Comments
		*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight.
		(40 CFR 268.2(f))
	3.	First, Second, and Third Wastes:
		2. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?
		Yes No NA

	If available, list each waste code and check the correct treatability group:						
	Waste Code	Subcategory	Wastewater*	Nonwastewater			
	VARIOUS						
				\pm			
	* Less than 1% (TSS) with the 5% by weight 10 than 4% by weigh	roc by weight an following except C and less than It TOC and less t	d less than 1% to ions: KO11, KO13, 1% by weight 188; than 1% by weight	tel suspended solids and KO14 wastewaters - less than K103 and K104 wastewaters - less TSS. [40 CFR 268.2(f)(2) and (3)]			
	Comments						
b.				wastes cover constituents that tics? [40 CFR 268.9 (b)]			
	Yes 🗸	No	NA				
c. .	Does the gene	rator specify al	ternative treatm	ent standards for lab packs?"			
	Yes	No _	NA				
	*Use of the alte	ernative treatmen	nt standards is no	t required. (55 FR 22629)			
	If yes, do lab p	acks only conta	in the following	wastes?* [40 CFR 268.42(c)(2)]			
			t 268, Appendix 68, Appendix V	IV constituents constituents			
	*Unregulated was commingled in th	ites and hazardou de appropriate Af	s westes which ma opendix IV and V (et treatment standards may be ab pack. [55 FR 22629]			
d.	Does the generative source leachate	rator specify ale	ternative treatm	ent standards for F039 multi-			
	Yes	No	NA_V				
	We of the site	rnative treatmen	t standards is re	quired. [35 fR 22619]			
Califorand tre	rnia List Wastes: eatment standard	: Has the gener i/prohibition le	ator correctly ide	entified the treatability group wing wastes? [55 FR 22675]			
2	Liquid hazardo	us wastes conti	aining PCBs ≥50) ppm			
	Yes	No	NA				
	If yes, check th	e appropriate t	reatability group	x			
	50 to 500 ≥500 ppm						

	b.	Listed or (non-lique content	Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content				
		Yes <u></u>	No	NA			
		If yes, ch	eck the appropri	ate treatability	group:		
		Allo	te HOC wastewa other HOCs great (liquids) or mg/k	er than or equa	to 10,000 mg/l H il to the prohibi	HOCs) tion level of 1,000	
	c.	Liquid ba ≥ 134 m	azardous wastes t g/l nickel and/or :	hat exhibit a ch > 130 mg/l thall	aracteristic and	also contain	
		Yes	No	NA			
5.	Natio been: A.)	nal Capacit identified fo	y Variance Wast or wastes covered	es: Have all app d under nationa	olicable Californ Il capacity varian	nia List prohibitions nces? (See Appendix	
	Yes_		No	NA 🗹			
	the wa	aste codes,		r identified all a		y applies to some of nent standards and	
•	Yes_		No	NA_V		•	
	comp	lete the foll	prohibitions app lowing table for e variances expire	ach waste code	ims managed by , noting the date	the generator, e on which relevant	
	Waste	: Code	Cal List A	pplicability	Expiration Da	<u>ne</u>	
						• •	
	Comp	nents					
6.	Treats an alte	ernative me	thod to that requ	aired in 40 CFF	ologies: Has the l 268.42?	e generator specified	
	Yes_	_ N	io <u> </u>	. .			
	If yes, metho	list the was	ste code, the tech umentation of ap	nology specifie proval. [40 CF	:d in 40 CFR 26 R 268.42(b)]	8.42, the alternative	
	Wa	ste Code R	Lequired Technol	ogy Alternativ	re Method	Approval	
	Сот	nents					

		a. Know Yes If yes, the ba ALL LIST b. TCLE analyz	viedge of waste: No
		a. Know Yes If yes, the ba ALL LIST b. TCLE analyz	No
		a. Know Yes_ If yes, the ba All	No
		a. Know	viedge of waste:
		treatment Stan	dard criteria have been met.
			answer to applicable questions b. through d. does not necessarily constitute However, knowledge of weste is rarely adequate if a generator certifies that
	2.	Which of the	following analytical methods does the generator employ?*
		Comments	
		Yes	No
		If no, does th standards?	e generator ship all restricted wastes as not meeting treatment
		*Note: This d prohibition le	etermination may be made at the point of disposal if the waste only has a vel in effect.
		Yes	No
	1.		perator determine whether restricted wastes exceed treatment oblibition levels at the point of generation?* [268.7(a)]
B.	Wast	e Analysis	,
		Comments	RESTRICTED WASTES ARE MIXED VIA FUEL BLENDING
		Yes 🗸	No
			e generator select the most stringent treatment standards? 41(b) and 268.43(b)]
		Yes 🗸	No

	test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)] HAZARDOUS WASTE FUEL (2-23-93)
	WASTE FLAMMABLE SOUDS (+15-93)
с.	Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)
	Ys No NA
	*See Appendix C for exceptions.
	If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]
đ	PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?
	Yes No NA
	*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SN-846]
	If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]
	the generator treat restricted wastes in 90-day tanks or containers regulated r 40 CFR 262.34 (permissible in some states)?
Yes_	No <u>v</u> (If No, go to 4.)
Does	the generator treat the wastes to meet appropriate treatment ards/prohibition levels?
Yæ.	No
If yes testic	has the generator prepared a waste analysis plan detailing the frequency of g to be conducted? 40 CFR 268.7(a)(4)]
Yes_	No (If No, go to 4.)
Does	the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]
	Based on a detailed chemical and physical analysis of a representative sample
\equiv	Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

3.

•

Y¤_	No
Com	nents
Diluti	ion Prohibition [40 CFR 268.3]:
a.	Does the generator mix prohibited wastes with different treatment standards?
	*See Appendix E for distinction between restricted and prohibited westes.
	Yes No (If No, go to b.)
	List the wastes LISTED WASTES IN FUEL BLEWOING (FOOI-FOOS, etc.
	Are the wastes amenable to the same type of treatment? [55 FR 22666]
	Yes No
	Comments INCINERATION; FUEL BLENDING
b.	Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
	Yes No (If No, go to c.)
	Check appropriate category:
	Dilutes to meet treatment standards Dilutes to render waste non-hazardous
	Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]
	Managed in treatment systems regulated under the Clean Water Act Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43
	"Mon-toxic = 0001(except high TOC norwestewaters), 0002, and 0003(except symmidaes and sulfides). (55 PR 22666)-
	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
c.	Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]
	Yes No
	Comments

	5.	F039 l constit	Multi-source le tuents of conce	achate: Has thern in 40 CFR	e generator run 268.41 and 268.	an initial analysis for 43? [55 FR 22620]	all
		Yes_	_ No_	_ NA	\checkmark		
2	Мапа	gement					
	1.	On-Sit	e Managemen	t			
		2.	Are restricted greater than	d wastes treate 90 (small quan	d (other than in tity generator*	a RCRA exempt uni - 180) days, or dispose	it), stored for ed on site?
			Yes 🗸 .	No	\		
			(If yes, the TS	SD Checklist z	nust also be cor	npleted.)	
			* Small quantitiess than 1,000 waste	ty generator * q D kg/mo. hazardo	penerator of greatus waste, or jes	ter than or equal to 10 s than 1 kg/mo. acutely	0 kg/mo. but hazardous
			Comment	ACILITY HAS	INTERIM ST.	ATUS FOR TREATH	ENT, STORAGE
		b.	If the general Clean Water restriction, he	for treats chara Act, have the fow restricted w	icteristic wastes following been (astes are mana)	FOR) in systems regulated documented: the dete ged, and why wastes d libited (if applicable)?	under the ermination of ischarged
-			Yes	No	NA		
		c.	them non-baz	ardous, are the		in RCRA exempt un ed as restricted until 4 R 268.9(d)]	
			Yes	No	NA_V		
			*This applies to 268.41 and 268. treatment below	to both concentr .43, and to some r the characteri	estion based tres :40 CFR 268.42 re stic level. See	tment standerds specifi equired methods which r Appendix D.	ed in 40 CFR esult in
	2.	Off-Sit	e Managemen	t: Waste Excee	eds Treatment S	Standards	
		a.		evels (not subj	ect to a nationa	eeds treatment stands I capacity variance) to	
			Yes <u>√</u>	No	(If No, go to	3.)	
			Identify waste wastes are shi		off-site treatmen	nt or storage facilities	to which
			Waste Code VARIOUS	HES -IND	ing Facility NANAYOUS IN NOGET IL		

		Does the gen [40 CFR 268.		notification to the treatment or storage facility?			
		Yes <u>√</u>	No	(If No, go to 3.)			
		If the general certification r notification?	or specifies alte equired in 40 C	ernative treatment standards for lab packs, is the FR 268.7(a)(7) or (8) included with the			
		Yes	No	NA <u>V</u>			
	b.	Is a notification	on sent with eac	h waste shipment?			
		Yes <u></u>	No				
		If no, is the w quantity gene		tolling agreement pursuant to 262.20(e) (small			
		Yes	No	(If No, go to 3.)			
		List waste coo	ies and subsequ nent is held.	ent handler with whom a contractual			
		Waste Code	Subseque	ent Handler			
							
		Did the small facility with the CFR 268.7(a)	ne first waste shi	ntor provide a notification to the receiving ipment subject to the tolling agreement? [40			
		Yes	No				
3.	Off-Si	e Management: Waste Meets Treatment Standards					
	a.		erator ship wast E-site disposal f	e that meets treatment standards/prohibition acility?			
		Yes	No _	(If No, go to 4.)			
		Identify waste	code(s) and of	f-site disposal facilities:			
		Waste Code		Receiving Facility			
		— Down the east					
				notification and a certification to the disposal (i) and 268.7(a)(2)(ii)]?			

	ъ.	Are a notifica	tion and a ce	rtification sent v	with each waste shipment?	
		Yes	No			
		If no, is the w quantity gene	•	o a tolling agree	ement pursuant to 262.20(e) (sm	all
		Yes	No	(If No, go t	o c .)	
		List waste con tolling agrees		quent bandler w	rith whom a contractual	
		Waste Code			<u>Handler</u>	
			facility with th	he first waste shi	notification and a certification to the tolling	10
		Yes <u>`</u>	No			
	C.			hich have been ed to a Subtitle	rendered non-hazardous (in a D facility?	
		Yes	No	NA	(If No or NA, go to 4.)	
		Complete the	following tab	ole:		
		Waste Code		Receiving F	Facility	
					ch shipment sent to the Region FR 268.9(d)(1) and 268.7(b)(5)]	
		Yes_	No			
4.		Off-Site Man	agement: Wa	stes Subject to \	Variances, Extensions, or Petitic	XOS
	a.	which are sub	ject to a natio	astes to a treatm onal capacity var on (40 CFR 268	nent, storage, or disposal facility riance (40 CFR Part 268, Subpar L5)?	rt
		Yes	No	(If No, go t	o 5.)	
		Complete the	following tal	ole:		
		Waste Code		Receiving I	Facility	
			 -			
						

	Does the gen the waste is n	erator provid	e notification to the c from land disposal?	off-site receiving facility that [40 CFR 268.7(a)(3)]
	Yes	No		
ъ.	Is a notificati	on sent with e	each waste shipment?	
	Yes	No		
	If no, is the w 262.20(e) (sm	raste subject to nall quantity g	o a tolling agreement enerator only)?	pursuant to 40 CFR
	Yes	No	(II No, go to 5.)	
	. ~	des and subse	quent handler with w	hom a contractual
	Waste Code	Subse	equent Handler	
		he first waste :		ication to the receiving he tolling agreement?
	Yes	No		· ·
Reco	rds Retention			-
Does releva	the generator rant documents f	etain on site o or a period of	copies of all notificati 5 years? [40 CFR 26	ons, certifications, and other 8.7(a)(6)]
Yes	✓ No _			·
certif agree	ication, kept on ment? [40 CFR	site for at least 268.9]	st 3 years after expira	ne LDR notification and/or tion or termination of the
Yes_	No_	_ NA		
provi	ed national caps sion ^e ?	city variances	, case by case extensi	tes previously covered under- ons and the soft hammer-
Yes_	_ No_	_ NA	·V	
vestes	which had treats	ment Standards (haumer provision expire established in the This ance to 08/08/90.	nd as of 05/08/90. Soft harmer of Third rule were granted a
Come	nente			

5.

1.	Are restrict	ed waste units, wa	es treated in RCRA exe estewater treatment tan	mpt units (i.e., boilers, furnaces, ks, elementary neutralization, etc.)?
	Yes			ot complete this section.)
	List types o	í waste t	treatment units and pro	cesses:
	Waste Code	•	Type of Treatment	
				<u> </u>
_		~		
2			uals generated from the	se units?
	Yes	No.		•
	Comments			
3.	Are residua	is furthe	er treated, stored for gre	eater than 90/180 days, or disposed or
				•
	Yes	No	NA	• •
Addi	(If yes, the I	rsD che		ipleted.) Idressed in the Checklist:
Addi	(If yes, the I	rsD che	cklist must also be con	ipleted.) Idressed in the Checklist:
Addi	(If yes, the I	rsD che	cklist must also be con	ipleted.) Idressed in the Checklist:
Addi	(If yes, the I	rsD che	cklist must also be con	opleted.) Idressed in the Checklist:
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Addi	(If yes, the I	rsD che	cklist must also be con	opleted.) Idressed in the Checklist:
Addi	(If yes, the I	rsD che	cklist must also be con	opleted.) Idressed in the Checklist:

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

268.50(a)(3)]	sporter accumulate restricted wastes for more than 10 days? [40 CFR					
Yes 🗸	No					
If yes, check t	he appropriate regulatory status:					
Interim s RCRA p	ermit for storage (PART B PERMIT APPLIED FOR)					
(The TSD checklist must also be completed.)						
If no, describe	inventory controls to ensure that wastes are not stored for more than 10 days:					
	sporter mix or combine restricted wastes of different DOT shipping [40 CFR 263.10(c)(2)]?					
Yes <u>√</u>	No					
(If yes, the Ge	nerator checklist must also be completed.) OF DIFFERENT DOT SHIPPING-DESCRIPTIONS ARE MIXED					
IN THE FL	PEL BLENDING PROCESS					
Are restricted	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)?					
Are restricted wastewater tr	wastes treated in RCRA exempt units (boilers, furnaces, distillation units,					
Are restricted wastewater tr	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)?					
Are restricted wastewater tro Yes List types of w	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)? No					
Are restricted wastewater tro Yes List types of w Waste Code	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, entment tanks, elementary neutralization, etc.)? No					
Are restricted wastewater tro Yes List types of w Waste Code	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)? No					
Are restricted wastewater tro Yes List types of w Waste Code Are treatment Yes	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)? No					
Are restricted wastewater tro Yes List types of w Waste Code Are treatment Yes Comments	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)? No					
Are restricted wastewater tro Yes List types of w Waste Code Are treatment Yes Comments Are residuals	wastes treated in RCRA exempt units (boilers, furnaces, distillation units, eatment tanks, elementary neutralization, etc.)? No					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

1.	Does the waste analysis plan address the fe [40 CFR 264.13(b)(6) and 265.13(b)(6)]	ollowing LDR w	aste categories	?			
	F001-F005 Spent Solvents	Yes <u>V</u>	No	NA			
	F020-F023 and F026-F028 Dioxins	Ya	No	NA 🔽			
	California List Wastes	Yes_V	No	NA			
	First, Second, and Third Third Wastes	Yes	No	NA			
	Comments		· · · · · · · · · · · · · · · · · · ·				
2.	Has the waste analysis plan been revised to	address F039 n	nulti-source lea	chate?			
	Yes No NA <u>~</u>						
3.	What date was the waste analysis plan last	revised? 2/_	191				
4.	Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]						
	Yes No						
	If yes, which of the following are sources of apply.):	of analytical data	? (More than o	one may			
	Generator provides data Facility performs analyses in on-site la Facility contracts analyses at off-site la						
	If the generator provides data, does the fa CFR 264.13(a)(2) and 265.13(a)(2)]	cility provide co	rroborative test	ing? [40			
	Yes No NA						
	Yes: No NA NA If analyses are conducted off site, identify	labe HELLTAGE	E LAB INC.	in Romeonu			
		ds specified in 44 ching procedure	OCFR 268.41 a	nalyzed			

		If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)] HAZAR DOUS WASTE FUEL (2-23-93) WASTE PLAMMABLE SIXIOS (1-15-93)
		b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology [40 CFR 268.7(b)(3)]
		Yes No NA
		*See Appendix C for exceptions.
		If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]
		c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in <i>liquid</i> hazardous waste? [40 CFR 268.32(i)]
		Yes No NA
		If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]
B.	Oper	ating Record [40 CFR 264.73 and 265.73]
	1.	Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]
		Yes
	2	Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]
		Yes V No_
		*Include both those received from generators, and those prepared for off-site shipments.
	3.	Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]
		Yes No NA

		management	of wastes previ	cussed in points 2 and 3. reflect proper historical custy covered under expired national capacity variances, the soft hammer provision?
		Yes	No	NA V
		treatment stand	soft hammer pro- derds established ity variance to (rision expired as of 05/08/90. Soft hammer wastes which had I in the Third Third rule were granted a minimum 90-day 88/08/90.
C.	Store	ge [40 CFR 268	.5 0]	
	1.	-		d on site in containers?
		Yes_V	No	(If No, go to 2)
		*See Appendix E	for distinction	between restricted and prohibited wastes.
			ners clearly ma CFR 268.50(a)(rked to identify the contents and date(s) entering 2)(i)]
		Yes_V	No	•
			peen stored for ent into effect?	more than one year since the applicable LDR
		Y¤	No _	(If No, go to 2.)
	٠			th accumulation is necessary to facilitate property sal? [40 CFR 268.50 (c)]
		Yes	No	
		If yes, state ho)W:	
	2.	Are prohibite	d wastes stored	on site in tanks?
		Yes _	No	(If No, go to 3.)
		hazardous was	ste received, an ecorded and ma	with a description of the contents, the quantity of each d date each period of accumulation begins, or is such aintained in the operating record? [40 CFR
		Yes_	No	
		Have tanks be went into effe		least once per year since the applicable LDR regulations
		Yes	No	(If Yes, go to 3.)

			ty show that su tment, or dispe		lation is neccesary to faci FR 268.50(c)]	litate proper
		Yes	No			
		If yes, state be	ow:	····		
	3.		lity store liquid or equal to 50 p		s waste containing PCBs a	et concentrations
		Yes	No	(If No,	go to D.)	
		Does the facil	lity meet the T	SCA criter	ia in 40 CFR 761.65(b)?	[40 CFR 268.50(f)]
		Yes	No		\	
		Have these w	astes been stor	ed for mor	e than one year? [40 CFF	268.50(1)]
		Yes	No			
D.	Treat	ment			•	
	1.	Does the facil	lity treat restric	ted wastes	other than in surface imp	poundments?
		Yes 📈	No	(If No,	do not complete this sect	ion. Go to E)
	2.	Are required specified in 40	technologies w CFR 268.42?	sed to trea [40 CFR]	t wastes which have treat 268.40(b)]	ment standards
		Yes	No_V	NA	(If Yes or NA, go	to 3.)
		Was an altern	ative method a	pproved?		
		Yes	No	FUEL	BLEUDING	
		List each wast method. Che 268.42(b)]	te code, the tec ck if approval (chnology sp of the alter	pecified in 40 CFR 268.42 mative method is docume	L and the alternative nted. [40 CFR
		Waste Code	Required Te	chnology	Alternative Method	Approval
						
	3.	from lab pack	s containing D with the subpa	004, D005,	ndards are specified, are possible, D006, D007, D008, D01 ment standards for these	0, and D011 treated.
		Yes	No	NA_V		•
		•				

Pavient 10/01

4.	Desc	ribe all other w	कार codes का	d treatment processes	•	
	Wast VAR	SET	MICHL + PH	OLLOWED BY		
5.	Char	acteristic waste	s :			
		e 40 CFR Part 2 acteristic level?		standard lower than t	he 40 CFR Part 261	
	Yes	No_				
	This and 2 charac	applies to both 68.43, and to som cteristic level.	concentration me 40 CFR 268.4 See Appendix	based treatment stander 2 required methods whice 0.	ds specified in 40 CFR 265 h result in treatment belo	1.41 w the
	treat			e waste as restricted unafter the waste is rem	ntil 40 CFR Part 268 dered non-hazardous?	[40
	Yes .	No_				
•	Com	ments				
6.	Dilut	ion Prohibition	[40 CFR 268	3.3]:		
	2.	Does the fac	ility mix proh	ibited wastes with diff	erent treatment standar	ds?
		Yes 🗸	No	(If No, go to c.)	•	
		List the wast	es LISTED	SOLVENTS & DOOX	WASTES (FUEL BU	<u>sud</u> ns
	b.	Are the wast	es amenable	to the same type of tre	eatment? [55 FR 22666]
		Yes <u>V</u>	No			
		If yes, is this	method used	for the aggregated wa	stes?	
		Yes 🔽	No			
		Comments_				-
	c			f points a. and b., or at tute for treatment? [4	ny other relevant inform 10 CFR 268.3(a)]	ation,
		Yes_	No			
		Comments_				

7.	Does the factor from all treat	ility, in accordance with an acceptable waste analysis plan, test retiment processes? [40 CFR 268.7(b)]	≾idues
	Y¤ <u>√</u>	No	
	Commenus		
8.		ility ship any characteristic wastes which have been rendered nor a Subtitle D facility?	1-
	Ys	No (If No, go to 9.)	
	Complete the	e following table:	
	Waste Code	Receiving Facility	
		·	
		ation and a certification for each shipment sent to the Regional r or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]	
	Yes	No	
9.	facility?	lity ship any wastes or treatment residues to an off-site land dispe	
	Yes	No V (If No. go to 10.) ONLY NON - HAZAR	Daus
	Complete the	following table: TANK BOTTOMS	
	Waste Code	Receiving Facility	
	Are a notifica waste shipme	tion and a certification provided to the land disposal facility with nt? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]	each
	Yes	No	
10.		lity ship any wastes or treatment residues to be further managed tment or storage facility?	at a
	Yes	No (If No, go to E)	

Complete the following table:

		Waste Code	Receiv	ving Facility
		Are appropria	re generator no	ANAPOLIS, IN LOUISIANA UGET, IL WL CEMENT - HANNIBAL, Mo otifications and certifications provided to the receiving nent? [40 CFR 268.7(b)(6)]
		Yes V	-	
E.	Surfac	e Impoundmen	, 	\$ 8.4]
	1.	Are restricted	wastes placed i	in surface impoundments for treatment?
				(If No. go to F.)
		List		
				the only recognizable treatment occurring in the surface 3.3(a) and 268.4(b)]
		Yes	No	
		Comments		
	3.	compliance wit		the Agency a waste analysis plan and certification of echnology requirements and ground-water monitoring .4(a)(4)]
		Y¤	No	
	4.			equirements have not been met, has a waiver been FR 268.4(a)(3)(ii)]
		Yes	No	NA
	5.	tested separate	ely, acceptably, lied in the waste	of sludge and supernatant from the surface impoundment, and in accordance with the sampling frequency and the analysis plan? (Attach test results.) [40 CFR
		Yes	No	•
	6.	Does the operaperformed in a 265.73(b)(3)]	ating record ad eccordance with	dequately document the results of waste analyses h 40 CFR 268.4? [40 CFR 264.73(b)(3) and
		Yes	No	
		Comments		

	7.	Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?
		Sludge Yes No Waste Code Supernatant Yes No Waste Code
		Provide the frequency of analyses conducted on treatment residues:
	8.	If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]
		Yes No NA
		Comments
		Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]
		Yes No
	9.	If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]
		Yes No NA
•		Comments
F.	Land	Disposal
	1.	Are restricted wastes placed in or on the land in units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]
		Yes No (If No, go to G.)
		*Note: Do not include surface impoundments addressed in E.
		If yes, specify which units and what wastes each unit has received:
		<u>Unit</u> <u>Weste</u>
	•	Describe facility is considered with an exceptable wants and his above wealthined
	2	Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]
		Yes No
		Comments

		O CFR 268.9(c)]
Y¤	No	NA
	waste may exceed a at characteristic	a characteristic level enly if the treatment standard for has been met.
Does the performed 265.73(b)	d in accordance	d adequately document the results of waste analyses with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and
Yes	No	`
If yes, at w	vhat frequency a	re analyses performed?
	•	ose of restricted wastes which are not prohibited?
Yes	No	(If No, go to 6.)
List waste	codes in approp	priate category below:
Case-By-C	Case Extension (ce (40 CFR Part 268, Subpart C)
Treatmen	t Standard Varia) CFR 268.6)_ ance (40 CFR 268.44)
Does the copy of the restricted	operating record	d contain records of the quantities, date of placement, and a discation [40 CFR 268.7(a)(3)] for each shipment of a case-by case extension or no-migration petition? [40]
Yes_	No	NA
		eiving wastes covered by a national capacity variance or eet the requirements in 40 CFR 268.5(h)(2)?
Yes	No	NA
If the faci reports to	lity has a case-by the Regional A	r-case extension, is progress being made as described in dministrator?
'Yes	No	NA
Are restri	cted wastes plac	ed in underground injection wells?
Yes	No	List

Othe	er Wastestream	IS .				
1.	Does the factories treatment un		wastes other than re	sidues from RCRA		
	Yes	No	(If No, go to H	L)		
2	On-Site Mai	nagement				
	Wate restr	er Act. have the iction, how resuant to an NPI	e following been do tricted wastes are n	ystems regulated under ocumented: the determ nanaged, and why waste prohibited (if applicab	ination of s discharged	
	Yes	No	NA\			
	non-	hazardous, are		RCRA exempt units to a set as restricted until 40 R 268.9(d)]		
	Yes	No	NA_ <u>_</u>	<u>-</u>		
	268.4	1 and 268.43, an	n concentration based nd to some 40 CFR 268 Characteristic level.	treatment standards spec .42 required methods whis See Appendix D.	cified in 40 CFR ch result in	
3.	Off-Site Mar	nagement: Wa	ste Exceeds Treatm	nent Standards		
	Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?					
	Yes <u>v</u>	No	(If No, go to 4.)		
	Identify wast shipped.	tes code(s) and	off-site treatment	or storage facilities to w	hich wastes are	
	Waste Code	Rece	iving Facility			
	VARIOS			• • •		
	Are LDR no facility? [40 (otifications prov CFR 268.7(a)(1	vided for each ships 1)]	ment to the treatment o	or storage	
	Yes	No	(If No, go to 4.)		

G.

	If alter	ernative trea red in 40 CF	tment standar R 268.7(a)(7	rds are specified or (8) included	d for lab packs, is the certification d with the notification?			
	Yes_	N	°_	NA_\				
4.	Off-S	ite Managen	nent: Wastes	Meeus Treatm	ent Standards			
	2.	Are waste off-site dis	ards/prohibition levels shipped to an					
		Yes	No <u>v</u>	(If No,	go to 5.)			
		Identify w	aste code(s) s	and off-site disp	oòsal facilities:			
		Was	te Code	Receiving Faci	lity			
					<u>-</u>			
		Are LDR disposal fa	notifications cility? [40 Cl	and certificatio FR 268.7(a)(2)	fications provided for each shipment to the (a)(2)(i) and 268.7(a)(2)(ii)]?			
		Yes	No	(If No,	go to b.)			
	ъ.			s which have b ipped to a Subt	een rendered non-hazardous (in a title D facility?			
		Yes	No	NA	(If No or NA, go to 5.)			
		Complete	the following	table:				
		Wasi	e Code	Receiving Faci	lity			
						٠		
		Are a noti	fication and a ator or autho	certification for	or each shipment sent to the Regiona 0 CFR 268.9(d)(1) amd 268.7(b)(5)?	i.		
•		Yes	No	•				

N/X 5.	Off-Si	ite Management: Wastes Subject to Variances, Extensions, or Petitions
	a.	Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?
		Yes No (If No, go to 6.)
		Complete the following table:
		Waste Code Receiving Facility
	b.	Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]
		Yes No
6.	Düutic	on Prohibition [40 CFR 268.3]:
	a.	Are prohibited wastes with different treatment standards mixed?
		*See Appendix E for distinction between restricted and prohibited wastes.
		Yes V No (If No, go to b.)
		List the wastes USTED SOLVENTS & IGNITABLE WASTES
		Are the wastes amenable to the same type of treatment? [55 FR 22666]
		Yes <u>/</u> No
		Comments INCINERATION; FUEL BLENDING
		,
	b.	Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
		Yes No (If No, go to c.)
		Check appropriate category:
		Dilutes to meet treatment standardsDilutes to render waste non-hazardous

	CFR 268.3(b)]
	Managed in treatment systems regulated under the Clean Water Ac Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43
	*Non-textic = D001 (except high TOC nonwasteweters), D002, and D003 (except of end sulfides). [55 FR 22666]
	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
c.	Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]
	Yes No
	C
Additional C	Comments
Additional C	
Additional C	
Additional C	
Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:
Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:
Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:
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Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:
Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:
Additional C	omments, Concerns, or Issues Not Addressed in the Checklist:

Name of Facility: HERITAGE ENVIRONMENTAL SERVICES	
I.D. Number: ILD 085349264	03/1620007
LOCATION: CANAL BANK ROAD, NE	<u>'</u>
LEHONT, ILINOIS 60439	
Date of Inspection: MARCH 30,1993	:
Inspector: DONNA CZECH	
Telephone Number: (708) 531-5900	""
Interim Status RCRA Permit Treatment Storage Disposal Land Disposal Facility	UALED 3-30-93
Are there any known releases? Yes No	<u> </u>
Does the unit receiving CERCLA waste meet the double liner requirements?	Yes No N/A
Any Class I violations? Yes No	
If yes, identify type briefly:	
	
Schedule for next inspection: SEPTEMBER 1993	

RECORD CENTER (0) Illinois Environmental Protection Agency RCRA INSPECTION REPORT Division of Land Poliution Control USEPA #: I IEPA #: 🕰 Facility Name: SERVICES Street Address: County: RD State: City: Region: Inspection Date: From: Weather: TYPE OF FACILITY Regulated As: Notified As: WAE SOF 5 WAF OSF SOF 90-Day F/U Required?: TYPE OF INSPECTION CEI: Sampling: Citizen Complaint: _ Closed: Other: CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawat: MON-REG LATED STATUS SQG: Claimed Nonhandler: Other (Specify in Narrative): PART A 1/9/80, from (Initial) or (subsequent) Notification. **Notification Date:** 92 Initial Part A Date: Amended: Approved by (US)(IL) EPA: Part A Withdrawai requested: PART B PERMIT APPLICATION Finel Permit beund Part B Permit Submitted: (Y) or N 110 178 ENFORCEMENT Has the firm been referred to -USEPA:(Y) or N _4/_/ Illinois Attorney General: Y or N County State's Attorney: Y or (N) ORDERS ISSUED CAFO: Consent Decree: CACO: 186 Federal Court Order: **IPCB-Order:** State Court Order: TSD FACILITY ACTIVITY SUMMARY AND CONTRACT HEAT Exempt per 35 IAC, Sec. **Activity** by 90 19 P Process Code 50 l 502 RECEIVED 2 3 SEP 1992

17. 552 1834

RECEIVED

WMD RCRA

MAY 2 7 1993

IEPA/DLPC

OWNER

OPERATOR

Name MURDGC	Name HERI-AS	-ي
Address 100 E ERIE ST		an no NE
City CHICAGO	City LEMON!	
State 1 L Zip 6 06 //	State / _	Zip 60439
Phone # 3/2675 8099	DL 4	139 115-1
PERSON(S) INTERVIEWED	TITLE	PHONE #
BOB GARCIA	PLANT MGR	7087371151
·		
INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
IJIMES HAENNICKS	108A 1685	7025315900
MIKE CHIMAHAM	USEPA /RCRA	3127864464
JONATHON ADEMICA	1	
THAD SLAUGHTER		
PREPARED NY	AGENCY/TITLE	PHONE #
\mathcal{U}	1	}

SUMMARY OF APPARENT VIOLATIONS

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		alings	420	<u>/ď</u>		Section
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Facility I e: HERITALL ENV SERVICES **WASTE DISPOSITION** USEPA #: IL 0 0 85 349 **FORM** 62 0007 9-9-92 Weste lot which to descript dick. Consequing Process (Feb. separa Vieste Herre Urchare real & On Annual Ger. or see. Miles 150 Jan Warilensed Strictment Report for: (Circle if present; Date of Less Aredysis JESEPA HAZ WASA cross out if not present). Rate of Garagaion Amount on Sile · On Brown? orstos .91 . % / Disposition **G**) ~100000 CONTINENTAL ILNITIFICE HW HAZ WASTE 62000 8-22-92 CEMENT -9-31-92 1001-43 6ALS/MOUTH 6115 1- CIE L NH WYSTE CIL MIGS HINNIBAL MO **G** (G) WASTE 144 BLENDED WITH 2 PARTS FINONE NA PETROLEUM GALS/YK KNOW 10001 WASHER S HW FUEL NAPHTHA SPILLS, REMED PROJETS **(G)** (G) WASTE ROLLINS ENV. 0001 VO ~40000 FLAMMBLE STRAINER CLUANINGS QH4C 8-18-92 165/14 FO01-5 F) DRAMS BATUN ROUGE , L.A 504105 OFF. SITE 65 TW/ ~40 IN VOLTORY LAB PACKS VARIUS 8.25.92 ED OLUMS (\mathbf{F}) DRUMS / MON. F SAUGET, 12 5H8075 CLEAN UPS LISTE D ~10000 ADDED TO HAZ WASTE 0FF-511E WA/9C 11AZAROGUS JARIES GILSIYR (F) HNOW. FUEL GOING FUR INCIN. WATER \mathbf{G}^{2} TEMPORARY INORGANIC WASTE 80 280 HES 9-4-92 MAUES F) DRUMS STURAGE 8-14.92 NOT TREATED DRUMS/MON INDIANAPOLIS, IN WASTE ON-SITE G G G G G

^{*} All "NO" responses must be explained in narrative.

NARRATIVE

Heritage Environmental Services (HES) is currently operating three divisions at the Lemont facility. First, Heritage operates a treatment plant which includes storage and treatment of hazardous wastes. The second division is Petroleum Management where HES picks up waste oil from off-site generators on a multi-stop permit. Lastly, FES has added a parts washer service under the name of Crystal Clean. Petroleum naphtha is used by customers as a solvent, which, along with the washer units, is supplied by Crystal Clean. The spent material has been exempted as a solid waste by the Permit section in Springfield. Trumbull- a division of Dwens-Corning Fiberglass Corp uses the spent solvent as a diluent and reactant in roof lapping compounds. Transportation at HES is a part of the Petroleum Management division, however manifests are kept at HES's Indianapolis, IN facility.

Industrial oils are accepted from off-site generators and processed to produce waste oil fuel. Approximately 90% of the fuel is on-spec and thirteen to facilities such as Ameropan-Chicago, IL and North Vernon Forge-North Vernon, IN. The remaining 10% of fuel is off-spec and elther mixed with the nazardous waste fuel or sent to HES in Indianapolis for treatment along with residual water and the rag layer (oil/water).

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is blended into hazardous waste fuel while the non-hazardous waste is shipped to HES in Indiana for treatment.

This, paints, and solvents are accepted for hazardous waste fuel blending. Fuel with acceptable BTU value is shipped to dement kilms such as Systech-Greencastle, IN and Continental Cement-Hannibal, MO. Fasidade and strainer cleanings from this process are shipped to an off-site incinerator as hazardous waste.

HES receives drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes, and other inorganic wastes. These, along with heavy hazardous waste fuels which cannot be treated on-site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These wastes are temporarily stored prior to shipment off-site for incineration or treatment.

HAZARDOUS WASTE GENERATED

Hazardous waste fuel- F001-5, K086, D00X, Varies- Produced from ignitable and ardous waste and non-hazardous waste oil. Approx 100,000 gallions/month generated and shipped to Continental Cement- Hannibal, MO or Systech- Greencastle, IN (cement kilns). About 62,000 gallons presently on-site.

m ...

Heritage Environmental Services 0311620007 9-9-92

Waste petroleum naphtha- D001- From 2 parts washers. Approx 144 gallons/year generated and blended into hazardous waste fuel on-site.

Waste flammable solids- F001-5, D001- Spills, remediation projects, strainer cleanings from secondary fuel blending. Approx 40,000 lbs/quarter generated and shipped to Rollins Environmental- Baton Rouge, LA. 80 drums currently on-site.

Lab packs- Various waste codes- Approx 40 drums/month generated and shipped to TWI- Sauget, IL. 65 drums currently on-site.

Listed hazardous water- Various waste codes- Hazardous wastewater from off-site generators. Approx 10,000 gallons/year generated and added to hazardous waste fuel going for incineration. No waste currently en-site.

Temporary storage waste- Various waste codes- Mainly inorganic wastes not treated on-site. Approx 80 drums/month generated and shipped to HES-Indianapolis, IN. 80 drums currently on-site.

HAZARDOUS WASTE UNITS

SO1- Container Storage

Area 1- Container Storage/Processing Building
Concrete foundation with coated storage bays
Capacity- 468-55 gallon drums + 2-220 gallon totes

Area 2- Diked Concrete Pad
Capacity- 260-55 gallon drums

Area 3- Van Trailers (10) Capacity- 800-55 gallon drums

500- Tank Storage

Tanks are located in a tank farm with a concrete floor and walls VRT 1-4 Initial vacuum receiving tanks
CB 1-4 Cone bottom gravity separation tanks
SF 1-7 Supplemental fuel storage tanks

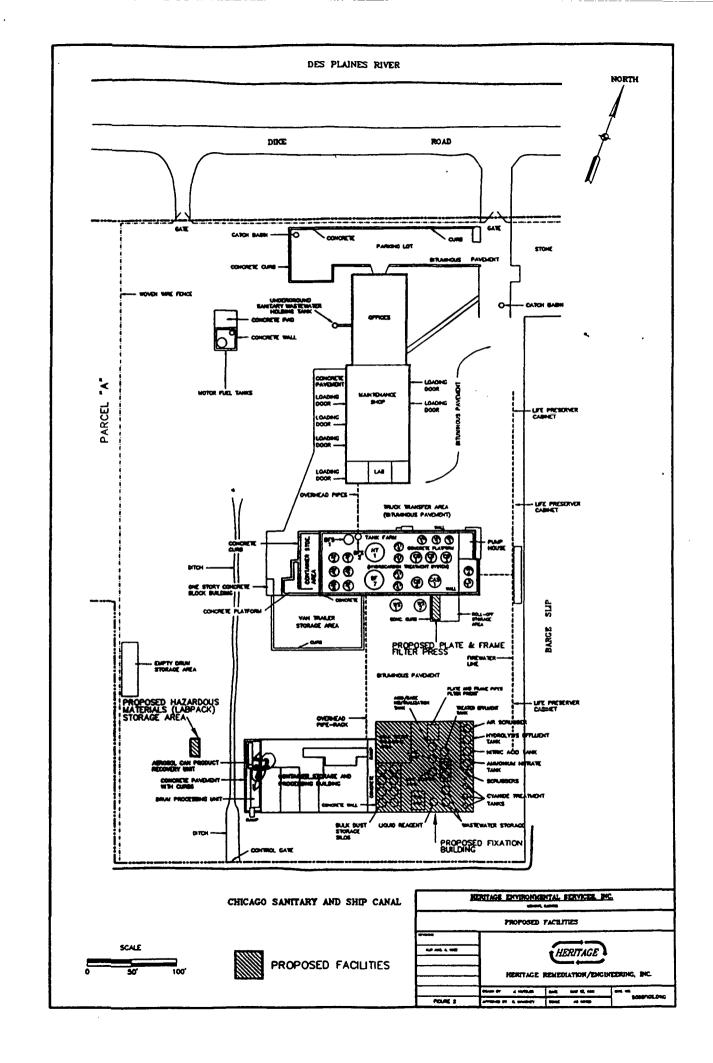
TO1- Treatment in Tanks

Tanks are located in a tank farm with concrete floor and walls HT 1-5 Oil/hydrocarbon heat treatment tanks

T04- Other

Not occurring during inspection

Expritage Environmental Services is currently operating in compliance with state regulations and a CAFO issued on 9-26-85.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY PHOTOGRAPHS	5
9-9-92	*
TIME: 945AM-215PM	*
SITE HAME: HERITAGE	* *
ENV SERVICES	*
SITE 8: 63/1620007	*
COUNTY: COOK	* *
**********	*
COMMENTS: 5	_
DRUM	•
PROCESSING	•
<u> unit</u>	
PHOTOGRAPH BY:	
PHOTO #: ROLL #: 93-74	



COMMENTS: W AEROSOL CAN PRODUCT RECOVERY GRAPH BY:



Area		Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		perent lience?	Not Applicable	Remarks or Comment No.
ОТ	Н	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HMM Facilities and Interim Status Qualifications	√		Ž	-
				a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
					1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes No N/A				·
IEPA/DLPC	2 3 SEP 1992	RECEIVED			 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 III. Adm. Code 725? Yes No N/A 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? 				
					Yes No N/A				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		operent olience? No	Not Applicable	Remarks or Comment No.
ОТН	1			Section 703.151: Application by New HMM Facilities For a new HMM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? YesNo			✓	NOT A NEW FACILITY
ОТН	1			After receiving approval from headquarters. Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes V No N/A	V			
				2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		operent olience?	Not Applicable	Remarks or Comment No
ОТН	1			Section 703.154: Prohibitions During Interim Status	V		Ž	
			a	During interim status, has the facility refrained from: - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No				,
			b	 Employing processes not specified in Part A of the permit application? Yes No 				·
			С	 Exceeding the design capacities specified in Part A of the permit application? Yes No 				
ОТН	1			Section 703.155: Changes During Interim Status	V			
			d	NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. Did the owner or operator submit a revised Part A permit				
				application not later than 90 days prior to changes in operational montrol or ownership of the HWM facility? Yes No N/A				

REVISION 1 (8/15/88)

		00	Key				ğ	REVISION 1 (0/13/00)
Area	Ciass	90 Day	Ltr	Requirement	In Ap	perent Hence?	polic	Remarks or Comment No.
*	٥	F/U Req	Sub Sec		Yeş	No S		None and the second sec
отн	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes No	V			•
ОТН	1		a C	Did the generator follow the procedures specified in this section in making its determination? Yes No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number? Yes No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes No	~			

Area	Ciass	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
MAN	2		b	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check not in the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No No			

			,		·		•	
Area	Class	90 Day	Key Ltr	Requirement		parent lience?	Applicable	Samaka as Comment No
Ā	Ö	F/U Req	Sub Sec	nequestion:	Yes	No	Not Ap	Remarks or Comment No
MAN	2			Section 722.121: Acquisition of Manifests	V			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?				
				or		•		
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A				INDIANA MISSOURI LOUISIANA
MAN	2			Section 722.122: Number of Copies	1			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2	į į	ŀ	Section 722.123: Use of the Manifest	1			
i			\	For each manifest received, has the generator:				
				1) Signed the certificate by hand?				
Marketti, verificio manumente			- Ar Swee	2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	perent lience?	ot Applicable	Remarks or Comment No.
			b	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes No N/A Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes No N/A		2	NO BULK SHIPHENTS BY WATER OR RAIL

					τ	 1	•	
Area	Class	90 Day F/U	Key Ltr Sub	Requirement	In Ap	perent Nance?	Applicab	Remarks or Comment No.
		реЯ	Sec		Yeş	No	ğ	
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				NO WASTE READY FOR TRANSPORTATION
ОТН	1	Х		Section 722.130: Packaging			\checkmark	OFF SITE
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
нто	1	х		Section 722.131: Labeling			\mathbf{A}	
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
ОТН	1	Х		Section 7226132: Marking			4	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes				
				transportation off-site marked with:				
				- The generator's name and address? Yes No				
				- The manifest document number associated with the container? Yes No				
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No				√

Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page 6EM-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 TII. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
		1	X	a	Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below:	✓			TRANSPORTER; DIMERWISE, TRANSPORTER SUPPLIES PLANARDS

PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the ginerator retained for a period of three years: - A copy of each signed manifest? Yes No - A copy of each annual report? Yes No - A copy of each exception report? Yes No N/A c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A d Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain have them? Yes No N/A No REQUESTS BY DIRECTOR.

	•	90	Key Ltr		In Apparent	
Are	Cler	Day F∕U Req	Sub Sec	Requirement	Compliance? &	Hemarks or Comment No.
нто	1	х		Section 722.134: Accumulation Time	1	
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.		
			al	For waste in containers, has the generator complied with the requirements of 35 III. Adm. Code 725, Subpart I?		
				and/or		
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes No		
			a 2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes No N/A		
			a 3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes No		7
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes No		
				'		

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825	Cleas	90 Day F/U	Ltr	Requirement		parent Kance?	picabi	90
`	0	Req	Sub Sec		Yeş	No	Vot Aç	Remarks or Comment No.
ОТН	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?	V		4	
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			Section 722.142: Exception Reporting			V	NO EXCEPTION REPORTS
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No				REQUIRED
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No				
			ь	Does any exception report submitted to the Director contain the following:				
				 A legible copy of the manifest for which the generator does not have confirmation of delivery; and 				
								Ÿ

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	in Ap Comp	parent blience?	Not Applicable	Remarks or Comment No.
				 A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A 			2	
ОТН	1			Section 722.143: Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			V	NO ADDITIONAL REPORTS REQUIRED
			·					
			and the second s					

Arse	Clees	90 Day F/U Req	Key Lir Sub Sec	Requirement	parent Hance? No	Not Applicable	Remarks or Comment No.
ОТН	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. Mhen citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.		✓	NO EXPORTS OF HAZARDOUS WASTE

Area	Class	90 Day F/U Reo	Key Ltr Sub	Requirement	Comp	perent fience?	t Applicable	Remarks or Comment No.
Area	1 (Jase	Day	Sub Sec	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Maste Section 722.160: Imports of Hazardous Maste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and Has the importer or his agent signed the manifest in place of the generator; and Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A Is the person importing hazardous waste using manifests obtained from the Agency? Yes No No	In Ap Comp Yes	perent flence? No	Not Applicable	Remarks or Comment No. No IMPORTS OF HAZARDOUS WASTE
			*					

Area	Class	90 Day F/U	Key Ltr	Requirement		operent bliance?	policable	Remarks or Comment No.
	Req		Sub Sec		Yeş		Not A	Nemarks of Comment No.
		·		PART 722 GENERATOR STANDARDS Subpart G: Farmers				
отн	2	χ		Section 722.170: Farmers			\checkmark	NO FARMING
				Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:				ACTIVITY
				- Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A				
				 Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A 				
				NOTE: If the answer to either of the preceding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).				
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Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		perent bliance? No	Not Applicable	Remarks or Comment No.
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General				
				Section 723.110: Scope	1			
	} -			Has the firm ever transported hazardous waste into the United States from abroad? Yes No				
				Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes No		·		FUEL BLENDING - TRANSPORTER IS ALSO
				NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				A TREATMENT FACILITY
отн	1			Section 723.111: USEPA Identification Number	V	<u> </u>		
			a	Has the transporter obtained a USEPA identification number?				·
отн	1	Х		Section 723.112: Transfer Facility Requirements	L			TRANSPORTER IS ALSO
				Has a transporter of hazardous waste stored manifested shipments of such waste:				A STORAGE FACILITY
\ 				- For a period of 10 days or less? - Yes No				
}								
<u> </u>				<u> </u>				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	in A Com Yeş	oparent oliance? No	Not Applicable	Remarks or Comment No	
				- Only in containers meeting the of 35 Ill. Adm. Code 722.130, Pack	aging?				
				NOTE: A "No" answer to the above question the transporter is also a storer of has subject to the requirements of 35 Ill. A 703, and 724 (725). Complete the TSD inspections	zardous waste dm. Code 702,				
				- 13 - 13					
						~			

Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	perent Hence? No	Vot Applicable	Remarks or Comment No.
; <u>.</u>				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS MASTE Subpart B: Compliance with the Manifest System and Recordkeeping		44.	
MAN	1/2			Section 723.120: The Manifest System		nasAt	TRANSPORTER
			a b	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes No Has the transporter who delivers hazardous waste to another transporter or to the designated facility:			MANIFESTS ARE KEPT AT HES IN INDIANAPOLIS

Area	Class	90 Day F.U Req	Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes No			
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes No			
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes No			
			е	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes No N/A			
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes No N/A			
			g	Has the transporter who transports hazardous waste out of the United States:			
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes No			
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes No			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	perent lience? No	Not Applicable	Remarks or Comment No.
MAN	1		380	3) Apparently returned a signed copy of the manifest to the generator? Yes No 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes No Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes No NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions:	V 05	No	ON.	
				Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
			Sec .	AND 4) The date the waste is accepted? Yes No AND Does the transporter carry this record when transporting waste to the reclamation facility? Yes No AND Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes No Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to: 1) The designated facility on the manifest? Yes No OR 2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes No N/A OR	Yeş	No	ON	

Aras	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent fiance?	Not Applicable	Remarks or Comment No.
ОТН	2		b	3) The next designated transporter? Yes No N/A OR 4) The place outside the United States designated by the generator? Yes No N/A MOTE: A "No" answer can still be in compliance. In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes No N/A Section 723.122: Recordkeeping Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes No No Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes No N/A Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes No N/A N/A		Motrial	NO SHIPMENTS OUTSIDE THE U.S. PRANSPORTER MANIFESTS IN INDIAN APOLIS NO BULK SHIPMENTS BY WATER OR RAIL

Ares	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
				Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes No N/A Does a transporter who is involved in any unresolved			NO SHIPMENTS OUTSIDE THE V.S.
				enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes No N/A OR	-		NO UNRESOLVED ENFORCEMENT ACTION
			е	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes No N/A			NO REQUESTS BY DIRECTOR
				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	perent dence?	ot Applicable	Remarks or Comment No
			1	PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges			*	
отн	1			Section 723.130: Immediate Action		ļ	$ \underline{\vee} $	No DISCHARGES
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes No				FROM TRANSPORT VEHICLES
			С	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes No				
отн	1	X		Section 723.131: Discharge Clean-Up			M	/ ·
				After a discharge of hazardous waste did the transporter:				
				- Clean-up the discharge? Yes No	:			
				- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes No				
The state of the s								

				·				
Area	Class	90 Day F U Req	Key Lir Sub Sec	. Requirement	Comp	pparent bliance?	Not Applicable	Remarks or Comment No
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery			•	
				NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
НТО		Х		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	V			
	1		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A				
отн				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	Y	-		
	ī			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A				
НТО		X		Section 726,134: Standards Applicable to Marketers of Hazardous Waste Fuel	V	1	-	
нто	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A				
				and				

			V. 1		 1	*	
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicat	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes No N/A			•
	11		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes No N/A			
	I		С	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes No N/A			
	I		đ	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes No N/A			·
	II		е	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes No N/A			,
	11		е	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes 1 No N/A			
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes No N/A			,

Area	Class	90 Day F U Req	Key lir Sub Sec	Requirement	In App Compli	ance? §	Remarks or Comment No
ОТН				Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel			BURN H.W. FUEL
	Ι		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes No N/A			
	II	 	b	Has the USEPA been re-notified as to the burner's hazard- ous waste fuel activities? Yes No N/A			
	I		С	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes No			
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.			
	I		С	Is the facility in compliance with 722.134? Yes No N/A			
	II		đ	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes No N/A			
	11		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes No N/A			

	,							
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent bliance? No	Vot Applicable	Remarks or Comment No
ОТН	I II		b1	PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS MASTE AND SPECIAL TYPES OF HAZARDOUS MASTE MANAGEMENT FACILITIES Subpart E: Used 011 Burned for Energy Recovery Section 726.143: Standards Applicable to Marketers of Used 011 Burned for Energy Recovery Has the marketer conducted an analysis of the used 011? Yes No N/A NOTE: If "No", then Subpart E applies. Does the off exceed any of the specifications listed in 726.140(e)? 10/a off 10/			Ž	
ă	ŀ	ŀ		1 : _ : _ : _ : _ : _ : _ : _ : _ : _ :	1	ł	ì	L

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	Comp	parent lience?	lot Applicable	Remarks or Comment No.
	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes No			2	
	H	·	b6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes No N/A				
	II		b6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes V No				·
отн				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery			\checkmark	FACILITY DOES NOT BURN USED OIL
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.				
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes No N/A				
	II		b	Has the proper notification been given to USEPA? Yes No				
				NOTE: Explain your response in the remarks column.				

Are.	Class	90 Dav F U Req	Key Ltr Sub Sec	Requirement	oparent blience? No	Not Applicable	Remarks or Comment No
	11		c	Has the burner provided to a marketer, before accepting any off-specification oil, the one-time signed certification notice? Yes No N/A If the burner blends off-specification oil so that it			
	11		e	now meets specifications, have analyses been done? Yes No N/A NOTE: If No, then Subpart E applies. Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)? Yes No			

Area	Class	90 Day F/U Req	Key Lir Sub Sec	Requirement	In Ap Comp	parent liance? No	Not Applicable	Remarks or Comment No
отн	•			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions				
UIA	1			Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			
			d	NOTE: If "Yes", explain in narrative. Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes No N/A				FACILITY DOES NOT MANAGE THESE WASTES
	·							

Ares	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent diance?	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
отн	1			Section 725.111: USEPA Identification Number	V			
				Has the facility obtained a USEPA identification number?				
отн	1			Section 725.112: Required Notices			V	NO WASTE ACCEPTED
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				FRUM FOREIGN SOURCES
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A				•
ОТН	1			Section 725.113: General Waste Analysis	<u>\</u>	1		
			al	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No				

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	oparent oliance?	Not Applicable	Remarks or Comment No
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No			
				Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator developed a written analysis plan? Yes No No No No No No No			GENERATOR PROVIDES PRE-ITCHTITUCE INFO RELIGIONED ANNUITLY - TESTED IF NECESSARY - EV. INCO. MING LOADS HAS QA/QC ANALYSIS DONE ON A KEP. SAMPLE

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	oparent oliance?	Not Applicable	Remarks or Comment No
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No				
Andrew Company (Market Street) to the			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters?				
				Yes No 2) The test methods which will be used to test for those parameters? Yes No				
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No				
								•

Ares	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance?	Not Applicable	Remarks or Comment No
ОТН	1	X	C	6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - (725.293 (Tanks);) - 725.325 (Surface Impoundments); - 725.325 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes No N/A MOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes No N/A Section 725.114: Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes No V	V			

Area	Cless	90 Day F/U	Key Ltr Sub	Requirement	oparent oliance?	Applicable	Remarks or Comment No
YMA	Cless	Day	Ltr	Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No OR 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes No Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes No NOTE: Existing signs with legends other than the one above may be used if the legend oth		Not Applicable	Remarks or Comment No
			**	· · · · · · · · · · · · · · · · · · ·			

		ı 90	Key				D	
Ares	Class	Day F/U	FA	Requirement		perent liance?	polic	Remarks or Comment No
	0	Req	Sub Sec	·	Yeş	No	Not A	
ОТН	2			Section 725.115: General Inspection Requirements	V		-	
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes _ ✓ No				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No				·
			ь1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No				
			b2	Is the written schedule at the facility? Yes No				
			ь3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes No				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes No				
								}

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
			c d	- The items and frequencies, where applicable, called for in Sections: - 725.214 (Containers) - 725.2294 (Tanks) - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the applicable section. Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes No N/A Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes No N/A Does the owner or operator record the results of inspections in a log or summary? Yes No N/A The date and time of the inspection? Yes No The name of the inspector? Yes No No The name of the inspector?			

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	lot Applicable	Remarks or Comment No
HTO	Cless	Day F/U	Sub Sec	- A notation of the observations made? Yes No No N/A - The date and nature of any type of corrective action? Yes No N/A Section 725.116: Personnel Training Does the facility have a training program? Yes No No NOTE: If "No", skip to Section 725.117, Page TSD-B-10. Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No			Not Applied	Remarks or Comment No
				equipment? Yes No N/A				

B) Key parameters for automatic waste feed cutoff systems? Yes No N/A C) Communications or alarm systems? Yes No N/A D) Response to fire or explosion? Yes No N/A E) Response to ground water contamination incidents? Yes No N/A Does the program cover the implementation of the contingency plans? Yes No No b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A c Has the facility conducted an annual review of the initial training? Yes No N/A d Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No No

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance?	Not Applicable	Remarks or Comment No
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes No N/A				
отн	1	Х	,	Section 725,117: General Requirements for Ignitable, Reactive or Incompatible Wastes	V	1-		
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes No				
To the state of th			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes No				

Area	Cless	90 Day F/U Reg	Key Ltr	Requirement	Com	pparent pliance?	t Applicable	Remarks or Comment No
YES	Cless	Day	Sub Sec a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or compingling of incompatible wastes and materials being done so that it does not: 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No 4) Damage the structural integrity of the device or facility containing the waste? Yes No 5) Through other like means threaten human health or the environment? Yes No	In A Com	pliance?	-Not Applied	Remarks or Comment No

Yus	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	pparent pliance? No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A			V	
				NOTE: A "Yes" answer is a violation of the location standard.				
								•

Area	Cless	90 Day F/U	Key Ltr	Requirement		parent diance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	No	Not ,	
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				
ОТН	1	Х		Section 725.131: Maintenance and Operation of Facility	V			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
T development of the control of the				- Air; - Soil; or - Surface water,				·
				which would threaten human health or the environment? Yes No				
нто	1	х		Section 725.132: Required Equipment	V			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				ALARM PA SYSTEM
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? No No N/A				τ χ - 3 ματα - γ
			b	- device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police of fire departments or State or local emergency response teams? Yes No N/A				

Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In A Com	pperent pliance? No	Not Applicable	Remarks or Comment No
ОТН	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No N/A	✓			FIRE EXTINGUISHERS SHILL STATIONS SHEETY SHOWERS WEEKLY MONTHLY WEEKLY

Amı	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
отн	1	X		Section 725.134: Access to Communications or Alarm Systems	V			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				
			b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725,132? Yes No N/A				THERE IS ALWAYS MORE THAN ONE EMPLOYEE ON SITE DURING UPERATING HOURS
OTH	1	X		Section 725.135: Required Aisle Space	V			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
отн	2			Section 725.137: Arrangements with Local Authorities	V			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				·

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec		Requirement	oparent oliance?	Not Applicable	Remarks or Comment No
				1)	Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes No N/A			LEMONT POLICE & FIRE COUR G. SHEKIFT ILL. ESDA
				2)	Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A		,	TYPICALLY, LEMONT PERSONNEL WULLD RESPOND
				3)	Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A			
				4)	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes NO N/A			SILVER CKOSS HOSPITAL IN JOHET BOLING BROOK MLD. CIR.
			b	record, into any	MOTE: Any "N/A" answer must be explained in the Comments. owner or operator documented, in the operating refusal of State or local authorities to enter or all of the above arrangements? NO N/A			NO REFUSALS

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDQUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
ОТН	1			Section 725-151: Purpose and Implementation of Con- tingency Plan	V			
			a .	Is a plan available? Yes No NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No				•
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A				
ОТН	2			Section 725.152: Content of Contingency Plan	V			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires? Yes V No				·
				2) Explosions? Yes <u> </u> No				

Aras	Cleas	90 Dey F/U Req	Key Lir Sub Sec	Requirement	operent olience? No	Not Applicable	Remarks or Comment No
	3			3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No Does the plan describe the arrangements agreed to by: 1) Local police and fire departments? Yes No 2) Hospitals? Yes No 3) Contractors? Yes No 4) State and local emergency response teams? Yes No Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes No Is the list of emergency coordinators up-to-date? Yes No If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes No Does the plan identify: 1) A list and physical description of all emergency		Mot M	
				equipment at the facility? Yes No			

Area	Cless	90 Day F/U	Key Ltr Sub	Requirement		In Apparent Compliance?		Remarks or Comment No
		Req	Sec		Yeş	No	Not ,	
				2) A brief outline of the capability of each piece of emergency equipment? Yes No				-
				3) The location of each piece of emergency equipment? Yes No				
			е	Is the list of emergency equipment up-to-date? Yes No				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes No N/A				·
			f	Does the plan identify the signal to be used to begin evacuation? Yes No				
			f	Are alternate evacuation routes identified? Yes No				
отн	2			Section 725.153: Copies of Contingency Plan	V			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes No				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes No				
				TS1-10-92	<u> </u>			

Aree	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent pliance? No	vot Applicable	Remarks or Comment No
отн	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever:	V			
			a b	 Applicable regulations are revised? Yes				PLAN HAS NOT FAILED
			C	The facility changes - in its design, con- circumstances - in a way that materially in- creases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				
			d	4) The list of emergency coordinators changes? Yes No				
ОТН	2		е	5) The list of emergency equipment changes? Yes No Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No	V			-

Area	Cleas	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	operent oliance?	Not Applicable	Remarks or Comment No.
ОТН	1/2		Po A	Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes NO Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes NO Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes NO NOTE: If the answer is "Yes", explain in detail the Incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.	V			9-1-88 SHREDDER EXPLOSION SEE MARCH 1989 INSPECTION REPORT 2 MINOR RELEASES 1-6-92 SMALL PIRE SEE 3-20-92 REPORT

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		operent olience?	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting	109		Z	
MAN	1			Section 725.171: Use of Manifest System	V			
				Does the facility accept waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				·
				For each manifest reviewed, did the facility:				•
			al	Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No				·
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes No N/A				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				·

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
: :			b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes No N/A	·			NO SHIPMENTS BY WATER OR RAIL
				Does the facility initiate shipments of hazardous waste? Yes No No NoTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.				
MAN	2			Section 725.172: Manifest Discrepancies	V		٠	~
				MOTE: If there are no manifest discrepancies, mark the "N/A" column.				1
			b	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one comtainer per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes \(\substituter \) No			: 1	•
			d	If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No				·
ų.								

Aras	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		operent olience?	Not Applicable	Remarks or Comment No
нто	2			Section 725.173: Operating Record	V			
			a	Does the owner or operator have a written operating record at the facility? Yes \(\sqrt{N} \)				
			b	Is the information in the operating record being main- tained until closure of the facility? Yes No				
			b	Does the operating record contain the following information:				
				1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No		,		
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes \(\sumbox \text{No} \)		-		
				3) The location of each hazardous waste within the facility? Yes No				
				4) The quantity of each hazardous waste at each location within the facility? Yes No				
				5) For disposal facilities, a map recording the location and quantity, of hazardous waste in each cell or disposal area? Yes No N/A				NOT A DISPOSAL FACILITY

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec		Requirement	Comp	oparent oliance? No	Not Applicable	Remarks or Comment No
				7)	A cross reference by manifest number to location will quantity of hazardous waste? Yes	Yeş	No	Not	THESE METHODS NOT EMPLOYED BY FACILITY

9) Records and results of inspections as required by Section 725.115(d)? Yes VNO MOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action. 10) Monitoring, testing or analytical data where required by Sections: - 725.190 (G.M. Monitoring)? Yes No N/A V - 725.194 (G.M. Monitoring)? Yes No N/A V - 725.376 (Land Treatment)? Yes No N/A V - 725.378 (Land Treatment)? Yes No N/A V - 725.378 (Land Treatment)? Yes No N/A V - 725.477 (Incinerators)? Yes No N/A V - 725.477 (Thermal Treatment)? Yes No N/A V - 125.477 (Thermal Treatment)?	Area	Class	90 Day F/U Req	Key Ltr Sub Sec		Requirement	Comp	operent olience?	Not Applicable	Remarks or Comment No
					by Section 725.1 Yes No	bove information on inspection only be kept for three years. would automatically be extended solved enforcement action. sting or analytical data where tions: Monitoring)? No N/A Monitoring)?			4.	

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2			11) All closure cost estimates required by Section 725.2427 Yes V No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records	√			NOT A DISPOSAL FACILITY
			С	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes No N/A - The local land authority? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A				NOT A DISPUSAL FACILITY NO UNRESOLVED ENFORCE MENT ACTION OR REGULESTS BY DUSANCE
			.	であっ マース・ボブ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・				OR REQUESTS BY DIRECTOR

•	Ana Class		Key Ltr			parent	Dicable	
₹	ีวี	F/U Req	Sub Sec	Requirement	Yeş	No	Not Ap	Remarks or Comment No.
ОТН	2			Section 725.175: Annual Report	V			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	·			
ОТН	1			Section 725.176: Unmanifested Waste Report	V			
				Does the facility accept hazardous waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				,
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ************************************				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				<u>-</u>
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apperent Compliance? Yes No	Not Applicable	Remarks or Comment No
ОТН	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No Section 725.177: Additional Reports			
				Has the owner or operator submitted to the Agency, as required, reports concerning:			
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes No N/A			
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes No N/A			
			С	3) Facility closure as specified in Section 725.215? Yes No N/A			
							•
							·

		90	Key		J ₅ A ₂	parent	cable	•
Area	Cless	Daγ F/U Req	Sub	Requirement	Comp	Hiance?	t Applix	Remarks or Comment No
			Sec	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements	Yeş	No	N N	
CLO	1			Section 725.212: Closure Plan	V			
			a	Was the most current facility closure plan available during the inspection? Yes No				
				Was the closure plan submitted to the Agency within				FACILITY IS NOT GOING
				the time frames specified below:				THROUGH CLOSURE
				- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes No N/A				
				- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A				
				- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A				
				- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A				

Area	Cleas	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				 No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes No N/A No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? 				
CLO	1		ā	Yes No N/A Section 725.218: Post-Closure Plan Was the most current facility post-closure plan available during the inspection? Yes No No			\	NOT REQUIRED
FIN	1			Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes N/A Section 725,242: Cost Estimate for Closure			-	
FIN	1			Has the facility prepared a written estimate of the cost of closing the facility? Section 725.244: Cost Estimate for Post-Closure Care	~		~	NOT REWUIRED
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				NOTE: If no post-closure plan, mark "N/A".				

Nes.	Cless	90 Day	Key Ltr	Requirement		parent pliance?	pplicable	Remarks or Comment No
2	ช	F/U Req	Sub Sec	negoranian;	Yeş	No	Not A	Nemers of Comment No
				PART 725 INTERIM STATUS STANDARDS FOR CHINERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
нто	1	χ		Section 725.271: Condition of Containers	V			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
нтс	1	X		Section 725.272: Compatibility of Waste with Containers	<u></u>			:
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
ОТН	1	Х		Section 725.273: Management of Containers	V	ļ		
			a	Are containers of hazardous waste always closed during storage? Yes No				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				
ОТН	2			Section 725.274: Inspections	V			
			(*) (*) (*)	Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes V No		% ∰:		

Area	Class	90 Dav F U Req	Key Ltr Sub Sec	Requirement		perent liance?	Not Applicable	Remarks or Comment No.
			y	MOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.			4	
ОТН	1	X		Section 725.276: Special Requirements for Ignitable or Reactive Wastes	\ <u>\</u>			
				Are containers holding ignitable or meactive waste located at least 50 feet from the property line?				
отн	1	х		Section 725.277: Special Requirements for Incompatible Mestes	V	-		
And the second s				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				
				;				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes No If "No", skip Subpart J.				
				NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No NOTE: Failing the filter test means that the waste contains free liquids.				LIQUID WASTE STORED IN TANK FARM OUTSIDE
отн	2		a	Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No No NoTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.	V			

Ama	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
OTH	1		a	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislocation and withstanding the effects of frost heave. 2) hazandous characteristics of the waste; and corrosion protection measures? No		>	NO NEW TANKS

Aras	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent bliance? No	ot Applicable	Remarks or Comment No.
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No			Z	√
отн				Section 725.293: Containment and Detection of Releases	V			
			aÎ	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes N/A				
			a 2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				
			a 3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				AGE OF TANKS IS UNKNOWN -
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A				SECONDARY CONTAINMENT IS ANTICIPATED BY 1995
				<u>or</u>				
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A				-
			a 5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent dience?	Not Applicable	Remarks or Comment No
			b1 & 2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A			
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).			
Application for the state of th			с4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A			
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.			
			đ	Does the secondary containment have one or more of the following:			
in e ditheir (* 1974) display en tras displayer				 a liner (external to the tank); or a vault; or 			
made dere tradition				3) a double-walled tank; or			
				4) an equivalent device (approved by the Board)? Yes No N/A			
1				MOTE: Liners, vaults or double-willed tanks must also comply with the requirements of Section 725.293, Subsection (e) No should be marked and explained in the comment.	4		
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:			

					, 		-	
Area	Ciess	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	lot Applicable	Remarks or Comment No
,	•		-	1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;			-	
				 welded flanges, joints and connections that are inspected daily; 				
				 sealless or magnetic coupling pumps that are inspected daily; and 				
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A				•
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				NO UNDERGRIUND TANKS
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A				
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A				
			: :	3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes No N/A				
								V

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1	X	b1 & 2	Section 725.294: General Operating Requirements Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)?	Y			MANUAL INSPECTIONS DURING FILLING
			b3	Yes No No Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A		,		NO UNCOVERED TANKS
			С	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A				NO LEARS OR SPILLS
ОТН	2		С	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspections as required in 725.295, Subsections (a) and (b)? Yes No	V	:		
отн	1	х		Section 725.296: Response to Leaks or Spills and Dispo- sition of Tank Systems			V	NO LEAKS OR SPILLS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No				
	•			MOTE: If "Me", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
				If a tank or secondary containment system has leaked, has the owner done the following:			<u> </u>	
			a	<pre>1) Ceased using, stopped inflow of wastes? Yes No</pre>				
	·		b	2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes No				
				3) Taken actions to prevent waste migration and removed and properly disposed of visibly con- taminated soil or subsurface water? Yes No				
			d	4) Reported to the Agency within 24 hours of detection? Yes No	;			
				NOTE: Reporting to the Agency is <u>not</u> necessary if tess than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.				
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No				
			e4	If the source of the release was from a component of a tank statem without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No N/A				
				NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.				

Aree	Cless	90 Day F/U	Key Ltr	Requirement .		parent liance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	No	Not	
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A				
				Has the certification been submitted within 7 days after returning the tank system to use? Yes N/A				
CLO	1			Section 725.297: Closure and Post Closure Care			V	FACILITY NOT GOING
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				THROUGH CLOSURE
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No				
		:	a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes No				
			b	If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? YesNo				
				NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes No	V			
				If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes. Are there proper protective distances between the waste management area and the facility boundary line? Yes No				
ОТН	1			Section 725.299: Special Requirements for Incompatible Mastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A			<u> </u>	IN COMPATIBLES ARE NOT STORED IN THE SAME TANK

Aras	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
OTH	1		a	Section 725.300: Maste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner: 1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A Or 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.			TANKS NOT USED TO STORE SIGNIFICANTLY DIFFERENT WASTES

GENTSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

L General Informati	949.					
Facility:	_ <i></i> ; <u>;</u>	CRITAGE	ENIRON	MENTAL	SERVICE	-5
U.S. EPA ID No.:			1100	031/62	0007	
Street:	رے	INAL BAN	VK ROAD	NE		
City:	<u></u>	EMONT	St	se /L Zi	1. 60439	,
Telephone:		7087	39 1151			
Inspection Date: Weather Conditions:		70°/=	= 9454-219	(PM)		
Ins pectors:	Nam JAZ	<u>e</u> 4ES [{AEN] -	Agency/Titl		ephone Pars 3 / 5 3	100
Facility Representativ	res: <u>bot</u>	B GARGIA	PLANTM	6R 708	739 1151	,
See Appendix B to de	_	_	_			•
	Generate	Transport	Treat	Sione	Dispose	
F001-F005 Solvenus F020-F023						See a sept
and F026-F028			411-12-12-12-13-13-13-13-13-13-13-13-13-13-13-13-13-			•
California List				<u></u>		
First Third [40 CFR 268.10]	<u>~</u>					
Second Third '40 CFR 268.11]	<u>/</u>	<u> </u>	V	<u>\</u>		RECEIVED 2 3 SEP 1992
Third Third [40 CFR 268.12]		<u></u>	<u></u>			IEPA/DLPC

[·] See Accounting A

GENTSDITEANS

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- FUEL BLENDING OF HAZ WASTE W/ MASTE OILS
- RE-PACKAKING OR RE-MANIFESTING HAZ WASTES
 ACCEPTED I=ROM OFF SITE GENERATORS

LDR Waste Management:

TREMIMENT OR INCINERATION

Summery.

NO LPR VIOLATIONS

RECEIVED

03.**!C**V-678

Signature Jamis Harriel

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

IL WASTE IDENTIFICATION

1.	F001 through F005 spent solvents:
••	FOOL THROUGH FOOS SPENT SOLVENTS
2	F020-F023 and F026-F028 dioxin-containing wastes:
3.	California List Wastes (See Appendix A): VARIOUS WASTE CODES POSSIBLE
4.	First Third Wastes [40 CFR 268.10]: VARIOUS WASTE CODES POSSIBLE
5.	Second Third Wastes [40 CFR 268.11]: VARIOUS WASTE CODES POSSIBLE
6.	Third Third Wastes [40 CFR 268.12] VARIOUS WASTE CODES POSSIBLE
or Ho chara the t by 03 was to even chara	Appendix 8. Ite: Effective 09/25/90, (arge quantity generators and TSDs are required to use the extensive leaching precodure (TCLP) instead of the extraction procedure (EP) for de existic characteristic (TC). Small quantity generators must comply with this new policity characteristic (TC). Small quantity generators must comply with this new policity characteristic exhibit TC, but do not employ EP, with the considered mounts. They will be regulated under 48 CFR Part 255-4611 after 1809 and exhibit exhibits and the EP tomation attention (SS FR 22531).
chera the t by 03 weste even chera	Appendix 8. Ite: Effective 09/25/90, (arge quantity generators and TSDs are required to use the extensive (eaching precedure (TCLP) instead of the extraction precedure (EP) for de excitiv characteristic (TC). Small quantity generators must comply with this new poly/29/91. Vastes which exhibit TC, but do not explicit EP, with the considered menty. 3. They will be regulated under 48 CFR Part 200 doi: 10.000 TSDs pre principle of the EP tested in they are characteristic for a constituent provided by sourced under the EP tested actoristic (53 FR 22331).
shere even the t by 03 chere and 10	ter Effective 09/25/90, large quantity generators and TSDs are required to use the extractive procedure (TCLP) instead of the extraction procedure (TP) for de carcity characteristic (TC). Small quantity generators must comply with this new policity characteristic (TC). Small quantity generators must estably with this new policity. Wastes which exhibit TC, but do not exhibit TP, with he canadidated mounty. They will be regulated under 40 CFR Part 265 and policy of the provinced that TP, if they are characteristic for a constituent provinced the SP toxist exteristic (SS FR 22531).
chera the t by 03 ueste even shere	ter Effective 69/25/90, large manelty generators and TSDs are required to use the extensitic leaching procedure (TCLP) instead of the extraction procedure (EP) for decirity characteristic (TC). Smill quantity generators must essaily with this new policy characteristic (TC). Smill quantity generators must essaily with this new policy of the characteristic for part and smill apply with the canadaras members. They will be regulated under 40 CFR Part 265 continued and the EP toxist extension (SS FR 22531). They are characteristic for a constituent provincially sweeted under the EP toxist extension (SS FR 22531). They all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?
chera the t by 03 ueste even shera	re: Effective 69/25/90, large manelty generators and TSDs are required to use the extractive leaching procedure (TCLP) instead of the extraction procedure (EP) for do noticity characteristic (TC). Smill quantity generators must escapily with this new policity characteristic (TC). Smill quantity graphers must escapily with the considered members. They will be regulated under 48 CFR Part 265 delta effort TSD PT quilibrated for 15 they are characteristic for a constituent provided by the process of compliance with 40 CFR Part 2657 Yes No
chera the t by 03 ueste even shera	ter Effective 69/25/90, large maneity generators and TSDs are required to use the extractive leaching procedure (TCLP) instead of the extraction procedure (EP) for de existive characteristic (TC). Smill quantity generators must essuit this new polyments must essuit this new polyment. The exhibit TC, but do not exhibit EP, with the exhibit of mounts. They will be requisted under 40 CFR Part 265 part 255 pa
chera the t by 03 ueste even shera	ter Effective 69/25/90, large manelty generators and TSDs are required to use the extractive leaching procedure (TCLP) instead of the extraction procedure (TP) for de oxicity characteristic (TC). Smil quantity of the extraction procedure (TP) for de oxicity characteristic (TC). Smil quantity of the extraction must explain the exhibit TC, but do not exhibit TP, with he canadered members. They will be requisted under 40 CFR fore all delignments and the TP toxicity of they are characteristic for a constituent provided the EP toxicity extension of the EP toxicity extension
chera the t by 03 ueste even shere	ter Effective 69/25/90, large manelty generators and TSDs are required to use the extractive leaching procedure (TCLP) instead of the extraction procedure (TP) for de oxicity characteristic (TC). Smil quantity of the extraction procedure (TP) for de oxicity characteristic (TC). Smil quantity of the extraction must explain the exhibit TC, but do not exhibit TP, with he canadered members. They will be requisted under 40 CFR fore all delignments and the TP toxicity of they are characteristic for a constituent provided the EP toxicity extension of the EP toxicity extension
chere the t by 03 ueste even chere	the Effective 69/25/10, (argo curretty governotors and Table are required to use the contribute leaching procedure (TCLP) instead of the end Table are required (EP) for de oxicity characteristic (TC). Build quantity generators must comply with this new 1/29/91. Westes which exhibit TC, but do not employ EP, with the constituent analysis. They will be regulated where 40 CFR Part and subject the EP testing of they are garacteristic for a constituent provided the end of the EP testing exterior (53 FR 22571). The Code Determination Have all westes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes

	2			haracteristic waste 40 CFR 268.9(a)]	code been assigned, where a li	sted waste
		Yes 🗸	No	NA		
		Comments				
	3.	Has multi-se	ource leachate	been assigned the	F039 waste code?* [40 CFR 26	51.31]
		Yes	No	NA_Y		
		Tleachete des	rived exclusively acte codes.	y from f020-f023 and	/or F026-F028 diexin vectos retai	as the
		If yes, was s 22623]	ingle-source le	erites combined to	form multi-source leachate?	(55 FR
		Yes	No	*	e e	
		Comments_				
C	Does	the facility ha	ndle the follow	ing wastes (nation	al capacity variances)?	
	1.	or a RCRA	corrective acti	oe (expires - 11/08/	ting from a CERCLA respons 90), [40 CFR 268.30(c)]	
		Yes	No _	List	from a Carolina response se	
	2	Diorin cont	aminated soil a ective action (e	nd debris resulting expires - 11/08/90).	from a CERCEA response so (40 CFR 268.31(b))	toe or a
		Yes	No	List		
	3.	California li action or a l	st co ntaminate RCRA correcti	d soil and delicities ve action (expires	naking from a CERCEA respo 11/06/90). [40 CFR 268.32(d)	1000 (2)]
		Yes	No 🖌	List	W	
	4.	K048-K052 (b)]	petroleum was	tes (popygatevalle	n; expires - (1/0/98); 440 CPI	R 268.35
		Yes	No_	List		
	5.	KO14, KO23,	set in the Seco K027, K028	ned Third rule - FV (aze, Kase, Kase,	had treatment standards bese 10, F024, K009, K010, K011, K K040, F348, K003, K094, K09 K040, F348, K003, K094, K09	013, 5, K096;
		U223, U235	(expires - 06/0	8/91). [40 CFR 268	1667; Utak, Utaz, Utar, Uta 134(6)]	i, UZZI,
		Yes	No _	List		

5.	Third Third	d rule based on i	ed with wastes that had treatment standards set in the noineration, mercury retorting, or vitrification. See 28/92). [40 CFR 268.35(e)]
	Yes	No V	List
7.			ters - F039, K031, K084, K101, K102, K106, P010, P011, 187, P092, U136, U151. (expires -05/08/92). [40 CFR
	Yes	No <u>~</u>	List
l.	(BODWESTER	waters), D008 (k	fied as hazardous based on a characteristic alone: D004 ead materials stored before secondary smelting), D009 - 05/08/92). [40 CFR 268.35(c)]
	Yes	No V	List
).		ring EPA Hazaro	fined in 40 CFR 268.2(g)*; includes chromium refactory dous Waste Nos. K048-K052 (expires - 05/08/92). [40
	Yes	No V	List
	*Mete: Inco	rrect reference (40 CFR 268.2(a)(7)] in Third Third rule.
.0.	RCRA haz (expires - 0	ardous wastes th 5/08/92). [40 CI	nat contain naturally occurring radioactive materials R 268.35(e)]
	Yes	No V	List
1.			8.10, 268.11, and 268.12 that are mixed es (expires - 05/08/92)*. [40 CFR 268.35(d)]
	Yes	No	List
			.11 wester incorrectly emitted from this variance in the Thir

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IIL GENERATOR REQUIREMENTS

		nent Standard Identif	·——·
	: This information is (ther documentation should		DR notifications. If not, waste profile d
1.	F001-F005 Spent Sappropriate treatal	olvent Wastes: Does to	he generator correctly determine the standard for each F-solvent?
	Yes V No	NA	•
	If available, list each	h waste code and chec	k the correct treatability group.
	Waste Code Foot Foot	Wastewater*	Nonwastewater
	*Less than 1% by weig FOCS solvent constit	pht total organic carbon wents listed in 40 CFR 2	(TOC), or less than 1% by weight total FO 68.41, Table CCME. [40 CFR 268.2(f)(1)]
	Comments		
2			: Does the generator correctly determine the standard for each dioxin waste?
	V.,	NA 🗸	
	IS No		
			correct treatability group.
			Nonwastewater
	If yes, list each was	te code and check the	
	If yes, list each was Waste Code	te code and check the	
	If yes, list each was Waste Code Comments	Wastewater*	Nonwastewater
	If yes, list each was Waste Code Comments	Wastewater*	
3.	If yes, list each was Waste Code Comments Comments Lace then-15 for by (40 CFR 268-2(1))	Wastewater*	Nonwasiewater
3.	Waste Code Comments Comm	Wastewater* Wastewater* weight and tess than 13	Nonwastewater total suspended solids (755) by unight.

	II SASTISOSE, D	Bi Catti Wabic Ci	ode and coece d	se correct treatmenty group:
	Waste Code	Subcategory	Wastewater*	Nonwasiewater
	VARIOUS		-	<u> </u>
	* Less than 1% (783) with the 5% by weight 10 than 4% by weight	TOC by weight or following except OC and less than give TOC and less	od less than 1% to tiones 6011, 6013, 1% by weight 185; Chan-1% by weight	otal suspended solids and ED14 vestousters - less than E165 and E164-vestousters - (ess :155. 640 CFR 248.2(1)(2) and (5)]
	Comments_			
b.				d wastes cover constituents that stics? [40 CFR 268.9 (b)]
	Yes 🗸	No	NA	
c.	Does the gen	erator specify a	lternative treats	nent standards for lab packs?*
	Yes	No V	NA	
	*Use of the air	ternative treatme	nt standards is n	ot required. (55 FR 22629)
	If yes, do lab	packs only cont	ain the following	wastes?* [40 CFR 268.42(c)(2)]
	Organon	netallics: 40 Par : 40 CFR Part 2	n 268, Appendia 268, Appendix V	r IV constituents constituents
	*Unregulated we commingled in t	estes and hazarde the appropriate A	us westes which m ppendix IV and V	eet treetment standards may be lab pack. [55 FR 22429]
d.	Does the gen source leachs		lternativo treatz	nent standards for F039 multi-
	Yes	No	NA 🗹	
	Tue of the all	tornetive treatme	nt standards is r	equired. (55 ft 22619)
Calle and t	ornia List Waste reatment standa	s: Has the gene rd/probibition is	rator correctly is evel for the follo	Sentified the trestability group wing wastes? [55 FR 22675]
1.	Liquid bazard	lous wastes con	taining PCBs ≥	10 pper
	Yes:	No	NA 🗹	
	If yes, check t	be appropriate	treatability grou	
	50 to 500 ≥500 pp	O pper PCBs		
				

				g ≥1,000 mg/l (liquid) I or characterized b		
	Yes <u>V</u>	No	NA			
	If yes, ch	eck the appropri	iate treatability	group:		
	V All o	te HOC wastewa other HOCs great (liquids) or mg/k	ter than or equ	to 10,000 mg/l HOe at to the prohibition	Cs) plevel of 1,000	
C.	Liquid ba	azardous wastes (g/l nickel and/or	that exhibit a ci ≥130 mg/i thai	naracteristic and als	o contain	
	Yes	No	NA V	•		
				plicable California al capacity variance		
Yes_		No	NA_	,		
comp	ifornia List lete the foll		oly to wastestre	ams managed by the	e generator,	
If Calcomple	ifornia List lete the foll	prohibitions applowing table for evariances expire	oly to wastestre	ams managed by the	e generator,	
If Calcomple	ifornia List lete the foll tal capacity	prohibitions applowing table for evariances expire	oly to wastestre each waste code	ams managed by the	e generator,	
If Calcomple nation	ifornia List lete the foll nal capacity Code	prohibitions applowing table for evariances expire	oly to wastestre each waste code	ams managed by the e, noting the date of Expiration Date	e generator, a which relevant	
If Calcomplination Waste	ifornia List lete the folloal capacity c Code	prohibitions applowing table for evariances expire	oly to wastestre	ams managed by the e, noting the date of Expiration Date	generator, a which relevant	
If Calcomplination Waste	ifornia List lete the folloal capacity Code Code	prohibitions applowing table for expired variances expired Cal List A	oly to wastestre each waste code	ams managed by the e, noting the date of Expiration Date	generator, a which relevant	
If Calcompination Waste Comm Treatian alte Yes If yes,	ifornia List lete the folloal capacity Code Code ments ment standernative me	prohibitions applowing table for expired variances expired Cal List A	biy to wastestre each waste code Applicability Arequired technical in 40 CF Annology specification	Expiration Date cologies: Has the get R 268.427	e generator, n which relevant enerator specified	
If Calicompination Waste Comm Treatian alice Yes If yes, method	ifornia List lete the foli lal capacity Code code ment stand ernative me list the war d, and doc	prohibitions applowing table for expire variances expire Cal List A ands expressed as ethod to that require to which the state of the	ply to wastestre each waste code applicability required technology specific oproval. [40 Cl	Expiration Date Cologies: Has the get R 268.427	e generator, n which relevant enerator specified	
If Calicompination Waste Comm Treatian alice Yes If yes, method	ifornia List lete the foli lal capacity Code code ment stand ernative me list the war d, and doc	prohibitions applowing table for expired variances expired Cal List A cal Lis	ply to wastestre each waste code applicability required technology specific oproval. [40 Cl	Expiration Date Cologies: Has the get R 268.427	e generator, a which relevant specified cherator specified 2, the alternative	
If Calicompination Waste Comm Treatian alice Yes If yes, method	ifornia List lete the foli lal capacity Code code ment stand ernative me list the war d, and doc	prohibitions applowing table for expired variances expired Cal List A cal Lis	ply to wastestre each waste code applicability required technology specific oproval. [40 Cl	Expiration Date Cologies: Has the get R 268.427	e generator, a which relevant specified cherator specified 2, the alternative	

	7.	Does the gen	nerator mix restrict of concern?	ed wastes with	different treatme	ent standards for a	
		Yes 🗹	No				
		If yes, did the [40 CFR 268	ne generator select t B.41(b) and 268.43(the most string b)]	ent treatment sta	ndards?	
		Yes 🗹	No			-	
		Comments	RESTRICTED	WASTES	are Mixed	VIA FUEL BUE	<u>wi</u> dnig
B.	Waste	Analysis					
	1.	Does the ge standards/pr	nerator determine rohibition levels at t	whether restric the point of ge	ited wastes excee peration?" [268.7	d treatment ((a)]	
		Yes <u>√</u>	No				
		•Wete: This prehibition i	determination may be level in effect.	sade at the pol	int of disposal if	the waste only has a	
		If no, does t standards?	the generator ship a	all restricted wa	ustes as not meeti	ng treatment	
		Yes	No				Name of the second
		Comments					
	2.	Which of th	ne following analytic	cal methods do	es the generator	employ?*	
	_	*Wete: A *We		ole questiens b. of weste is ren	through d. does to	et necessarily constitues to	tute list
		a. Kno	owiedge of waste:		Sance 1.	of the second	
		Yes	<u>√</u> No_	•		ton in the	
•		the	es, list the wastes & basis of determinate. U. INCOMING	tion. Attach d WASTES -	LISTED WAS	TES 14 000	
		14	JEDRHATION PR	ON DO BY	Courte	The same	
		2D 3	LP°: Are wastes wi alyzed using TCLP? hnology)	th treatment s (BDAT***	andards specific	1140 CFR 208A1	
		Ye		NA_	· .	way and the second	
			A Test Hether (S11) oe Appendix 6 for ex		g Procedure (40 CF	l Part 268, Appendix :	ι,

t	yes, list the wast is for which I CLP was used and provide the date of its the frequency of testing, and note any problems. Attach test result 0 CFR 268.7(a)(5)]	
_	HAZARDOUS WASTE FUEL	
-	LAST TCLP TEST: 2-31-92	
2	otal constituent analysis: Are wastes with treatment standards specified is.43 analyzed using total constituent analysis? (BDAT = struction/removal technology)	in
3	B_ No V NA_	
•	ne Appunishar's for exceptioning to the second	
t	yes, list the wastes for which total constituent analysis was used and predate of last test, the frequency of testing, and note any problems. At results. [40 CFR 268.7(a)(5)]	
	FLT*: Was PFLT used to determine if California List constituents are contained in liquid hazardous waste?	
3	≈_ No_✓ NA_	
•	FLT = Paint Filter Liquids Test [Test Nothed 9095, EPA Publication No. SU-8	443
t	yes, list the wastes for which PFLT was used and provide the date of last, the frequency of testing and now any problems. Attach test results FR 268.7 (a)(5)]	st - {
Does the under 40	generator treat restricted wastes in 90-day tanks or containers regulate CFR 262.34 (permissible in some status)?	d
Yes	No <u> (If No. 30 to 4.)</u>	
Does the standard	prohibition levels?	
Yes	No	
If yes, ha	the generator prepared a waste analysis plan detailing the frequency (be conducted? 40 CFR 268.7(a)(4))	Æ
Yes	No ([[Howp to 4])	
Does the	plan fulfill the following? [40 CFR 268.7(a)(4)(i)]	
Base	on a detailed chemical and physical analysis of a representative samplins information necessary to treat the wastes in accordance with 40 Cl 268 requirements	e R

3.

List the wastes	Yes_	No
Does the generator mix prohibited wastes with different treatment standards? **See Appendix E for distinction between restricted and prohibited wastes. Yes \(\sum \) No \((if No, go to b.) \) FOOI-FOOS List the wastes \(\sum \) \(\sum	Com	nents
The Appendix E for distinction between restricted and prohibited wastes. Yes \(\sum \) No \((\text{If No, go to b.}) \) FOOI-FOOS List the wastes \(\sum \) ISTED WASTES \(\sum \) FUEL BLENDING Are the wastes amenable to the same type of treatment? [55 FR 22666] Yes \(\sum \) No \(\sum \) Comments \(\sum \) CINERATION; FUEL BLENDING b. Does the generator dilute probabled wastes so meet treatment standard criteria, or sender about a probabled wastes so meet treatment standard criteria, or sender about a probable of the same appropriate category: Dilutes to meet treatment standards Do the wastes fall into the following call thins? (Check if appropriate.) GFR 268.263 (in treatment standard specified in 40 CFR 268.41 or 268.43 **Non-tonic** Characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 **Non-tonic** Characteristic wastes If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a and b, and any other relevant circumstances, does the generator of bits probabled wastes as a substitute circumstances, does the generator of bits probabled wastes as a substitute.	Diluti	on Prohibition [40 CFR 268.3]:
Yes No	٠.	Does the generator mix probabilied wastes with different treatment standards?
List the wastes STED WASTES IN FUEL BLENDING Are the wastes amenable to the same type of treatment? [55 FR 22666] Yes No Comments INCINERATION: FUEL BLENDING b. Does the generator dilute probabled wastes to meet treatment standard criteria, or sender them are marked to the standard criteria, or sender them are marked to the standard propriete category: Dilutes to meet treatment standards Dilutes to meet treatment standards Do the wastes fall join the following categories? (Check if appropriete.) CFR 262.401 are resident systems and treatment of the standard specified in 40 CFR 268.41 or 268.43 The standard specified in 40 CFR 268.41 or 268.43 The wastes do not fulf into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator effects probablised wastes as a substitute circumstances, does the generator effects probablised wastes as a substitute.		"See Appendix & for distinction between restricted and prohibited vestes.
Are the wastes amenable to the same type of treatment? [55 FR 22666] Yes No Comments _/N C/NE2ATION): FUEL BLEVONG b. Does the generator dilute prohibited wastes so meet treatment standard criteria, or sender them applicated wastes so meet treatment standard criteria, or sender them applicated wastes applicated wastes 22666] Yes No (If No, go to c.) Check appropriate category: Dilutes to meet treatment standards Dilutes to render waste applicated. Do the wastes fall into the following categories? (Check if appropriate.) CFR 268-368		Yes V No (If No, go to b.) Fooi-Foos
Comments /NCINERATION: FUEL BLEWONG Does the generator dilute prohibited waster to meet treatment standard criteria, or sender them man indicated the standard specific to the conditions of render waster and heart-down. Dilutes to meet treatment standards Dilutes to meet treatment standards Dilutes to render waster and heart-down. OFR 268.889 was promised to the standard specific to the conditions. Water Action of the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries a postton the standard specific in 40 CFR 268.41 or 268.43 "menteries and postton the standard specific in 40 CFR 268.41 or 268.43 "menteries and postton the standard specific in 40 CFR 268.41 or 268.43 "menteries and postton the standard specific in 40 CFR 268.41 or 268.43		List the wastes LISTED WASTES IN FUEL BLENDING
Does the generator dilute prohibited waster to meet treatment standard criteria, or sender them and standard criteria, or sender them and standard standard criteria, or sender them and standard standard standard standard standard standard standard standard standards. Dilutes to meet treatment standards Dilutes to render wester and hazardous		Are the wastes amenable to the same type of treatment? [55 FR 22666]
b. Does the generator dilute probleted waster to meet treatment standard criteria, or sender shess and large treatment standard criteria, or sender shess and large treatment standard (If No, go to c.) Check appropriate category: Dilutes to meet treatment standard: Dilutes to render waste man hazardous Do the wastes fall into the following categories? (Check if appropriate.) CFR 268.30 (Check if appropriate.) Managori is treatment wastes Non-toric characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 The wastes do not fall into the above categories, briefly describe the conditions under which they were dilutes. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute pichibited wastes as a substitute.		Yes No
Yes No (If No, go to c.) Check appropriate category: Dilutes to meet treatment standards Dilutes to render waste apprintment. Do the wastes fall into the following categories? (Check if appropriate.) CFR 268.4600		Comments INCINERATION; FUEL BLENDING
Check appropriate category: Dilutes to meet treatment straderds Dilutes to render water and hexarders Do the wastes fall into the following categories? (Check if appropriate.) CFR 268-8(8) Menaged in treatment systems regulated under the fallow Water Administrative characteristic wastes Treatment standard specified in 40 CFR 268-A1 or 268-A3 "ten-table a section applies the secure and set (escape over out (idea). If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a, and b, and any other relevant circumstances, does the generator dilute probablised wastes as a substitute.	b.	Does the generator dilute probabled waster to meet treatment standard criteria, or sender them see the second of t
Dilutes to meet treatment standards Dilutes to render wests assistanted and the conditions (Check if appropriate.) OFR 268.3(4)) *** Existing and the conditions of the conditions of the conditions of the conditions under which they were diluted. If the westes do not full into the above congenties, briefly describe the conditions under which they were diluted. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited westes as a substitute.		Yes No (If No. go to c.)
Dilutes to render waste agrichezardous Do the wastes fall into the following called and? (Check if appropriate.) GFR 268.200 (1995) Menogod in transplint systems seguilated under the fiers. Water Act Non-toxic characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "ten-toxic c test(emiss-bigs-tet sermestage,), sett, and sett(ensure operate sufficies). Its the falls. If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a, and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		Check appropriate category:
Do the waster fall into the following called as (Check if appropriate.) CFR 268.360) Menaged in translation systems regulated under the Clean Water Act Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "ter-toxic * test(seeps-blob-test parameteristics), seet, and sees(enseet over out suffices). Its in the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a, and b,, and any other relevant circumstances, does the presenter dilute prohibited wastes as a substitute.		Dilutes to render weste near hezardous
Managed in translibit systems regulated under \$100 Clean Water Ad Non-toxics characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "ten-toxics a section below test assume analysis, seek, and section of the section of the shore categories, briefly describe the conditions under which they were diluted. Based on an assessment of points a, and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		Do the wastes fall into the following called its? (Check if appropriate.)
Non-toxics characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "ten-toxics a section subject test assume analysis, seek, and section over one out fides). It is in the above categories, briefly describe the conditions under which they were diluted. E. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		
Treatment standard specified in 40 CFR 268.41 or 268.43 The results a section to the shore categories, seek, and sections over out tides. If the wastes do not full into the above categories, briefly describe the conditions under which they were diluted. Based on an assessment of points a, and b,, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		Non-train characteristic wastes
If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		Treatment standard specified in 40 CFR 268.41 or 268.43
c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute.		Then-table = 0001(septem-blob-10); paramote applicable, and 0005(except open and outfides). (55 fit (2006)
c. Based on an assessment of points a, and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute		conditions under which they were diluted.
•	c.	Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitut
		_

	5.	F039 M	ulti-source lead lenus of concern	chate: Has the n in 40 CFR 20	generator r 58.41 and 26	un an initial an 8.43? [55 FR :	alysis for all 22620]	
		Yes	No	NA_	\leq			
C.	Manag	ement						•
	1.	On-Site	Management					
		a.	Are restricted of greater than 90	wastes treated (small quanti	(other than	in a RCRA ex * - 180) days, c	empt unit), stored for or disposed on site?	
			Yes 🗹 .	No				
			(If yes, the TSI	Checklist m	ust also be c	ompieted.)		
			* Smell quentity less than 1,000 weste	generator = go kg/mo. Mezeroou	neretor of gr B weste, or i	eater than or ec eas than 1 kg/m	qual to 100 kg/mo. but o. acutely hazardous	
		1	Comments F	ACILITY HA	S INTER	IM STATU	S FOR TREATMEN	JT, STORAGE
		1	Clean Water A restriction, how	ct, bave the for restricted was	llowing been	n documented: laged, and why	egulated under the the the determination of wastes discharged plicable)? [55 FR	
		•	Yes	No	NA V			
		1		rdous, are the	wastes man	aged as restrict	tempt units to render ted until 40 CFR Part	·
		•	Yes /- ***	No_arcon	NA_V			
			This applies to 248.41 and 258.4 treetment below	tooth consumers	FIRE	estment standers required method of appairable 8.	de specified in 40 CFR de which result in	
	2	Off-Site	Management	Wait East	k Treatmen	t Standards		
			Does the gazer prohibition leveration statement or st	reis (not subje	waste that ex ex to a nation	ecceds treatme nai capacity var	ent standards riance) to an off-site	
		•	Yes 🔽	No	(II No, go	to 3.)		
			Identify waste (wastes are ship		f-site treatm	ent or storage	facilities to which	
		:	Waste Code VAR10US	TWI-S ROLLINS- OHM-G	ME Facility NDIANAPON AUGET, ILL - LOUISI GEORGIA- LLINOIS			

		[40 CFR 268.	7(a)(1)]	notification to the treatment or storage facility?
		Yes	No	(If No, go to 3.)
		If the general certification rentification?	or specifies alter equired in 40 CI	mative treatment standards for lab packs, is the FR 268.7(a)(7) or (8) included with the
		Yes	No	NA V
	b.	Is a notification	on sent with each	waste shipment?
		Yes 🗸 -	No	
		If no, is the wa	nate subject to a rator only)?	tolling agreement pursuant to 262.20(e) (small
		Yes	No	(If No. go to 3.)
		List waste cod tolling agreen	les and subseque sent is beld.	ent handler with whom a contractual
		Waste Code:	Subseque	nt Handler

		Did the small facility with the CFR 268.7(a)	e first waste shi	tor provide a notification to the receiving pment subject to the tolling agreement? [40
		Yes	No	
3.	Off-Si	ite Managemen	: Waste Meets.	Trestment Standards
	a.	Does the sea levels to make	restor chile man	that meets treatment standards/probibition
		Yes	**************************************	(ENE, 30 to 4)
		Educatily wester	code(s) and off	Seite disposal (acilities::
		Waste Code		Receiving Pacifity:
		·	18	
		facility? [40 (Erator provide a SFR 268.7(a)(2)	notification and a certification to the disposal (i) and 268.7(a)(2)(ii)]?
		Yes	No	(II No, go to d.)

		Yes	No			
		If no, is the w		o a tolling agree	ment pursuant to 262.20(e) (sm	ali
		Yes	No	(If No, go u) ()	
		List waste co tolling agrees	des and subse ment is held.	quent handler w	ith whom a contractual	
		Waste Code		Subsequent	Handler	
		the receiving	quantity general facility with the description of t	he first waste shi	notification and a certification pment subject to the toiling	ιο
		Yes	No			
	c.	RCRA exem	pt unit) shipp	ed to a Subtitle I	•	
		Yes	No	NA V	(If No or NA, go to 4.)	THE STREET STREET
			e following tal		اليعقر لوالوال المحاصيف الأحالة	and a processor of the state
		Waste Code		Receiving F	Facility	
					-	
					ch shipment sent to the Region R 268.9(d)(1) and 268.7(b)(5)	
		Yes	No		,	
4.		Off-Site Man	nagement: Wa	stes Subject to \	/ariances, Extensions, or Petitic	306
	•	which are sui	bject to a natio	astes to a treatm onal capacity var on (40 CFR 268	ent, storage; or disposal facility iance (40 CFR Part 268, Subpe 5)?	et
		Yes	No 🗸	(II No, go t	o 5.)	
		Complete th	e following tai	ble:		
		Waste Code		Receiving 1	Facility	

Are a notification and a certification sent with each waste shipment?

ь.

		Does the p	generator pro is not prohib	ovide notifi ited from k	cation to the or and disposal? [4	ff-site receiving 10 CFR 268.7(1	facility that 1)(3)]
		Yes	No	•			
	b.	Is a notific	ation sent w	ith each wa	ste shipment?		
		Ys	No	•		_	
		If no, is the 262.20(e)	waste subje (small quant	ect to a tolli ity generate	ng agreement p e only)?	pursuant to 40	CFR
		Yes	No	(II)	No, go to 5.)		
		List waste tolling agre	codes and su cement is be	bsequent h ld.	andler with wh	om a contractu	nal .
		Waste Cod	e S	ubsequent	Handler		
				·			
			the first wa			ration to the re e tolling agrees	
		Yes	No				
5 .	Recor	ds Retention	1				
					f all notification? [40 CFR 268.	ns, certification .7(a)(6)}	us, and other
	Yes_1	∠ No					
	certific		n ille for at			LDR sotifica on of Terminat	
	Yes_	_ No		NA_✓			
	Do LI capire provisi	d Baticaal ca	ts reflect pro pacity varies	per manag loss; case by	ement of waste case extension	s previously co as and the soft	vered under- hammer
	Yes_	_ No	_	NA_			
	MOSTOS -	pendix 8. Not which had trea 90-day nation	school standa	rds establis	led in the Third	es of 05/08/90. Third rule were	Soft harmer granted a
	Comm	ents		<u>.</u>			

Tre	atment Using R	CION TO CI		Ziene de l'ordina			
1.	Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?						
	Yes	No <u>V</u>	(If No. do no	or complete this section.)			
	List types of waste treatment units and processes:						
	Waste Code	e I	voe of Treatment	Treatment Units and Processes			
2	Are treatme	ent residual	s generated from the				
	Yes	No					
	Comments		**				
3.	Are residua	ls further tr	eated, stored for gre	ater than 90/180 days, or disposed on si			
	Yes	No	NA				
Add	-	nts, Concer	ns, or Issues Not Ad	pleted.) dressed in the Checklist:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checklist:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkfist:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checklist:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkfist:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkilst:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkilst:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad				
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkilst:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkilst:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checkilst:			
Add	itional Comme	nts, Concer	ns, or Issues Not Ad	dressed in the Checklist:			

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)] Yes 🗸 No If yes, check the appropriate regulatory status: ✓ Interim status for storage RCRA permit for storage (The TSD checklist must also be completed.) If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: Does the transporter mix or combine restricted wastes of different DOT shipping B. descriptions? [40 CFR 263.10(c)(2)]? Yes 🗸 No (If yes, the Generator checklist must also be completed.) WASTES OF DIFFERENT DOT SHIPMANDESCRIPTIONS ARE Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, C wastewater treatment tanks, elementary neutralization, etc.)? No V (If No, do not complete this section.) List types of waste treatment units and processes: Waste Code Type of Treatment Treatment Units or Process Are treatment residuals generated from these units? No ___ Yes ___ Comments Are residuals further treated, stored for greater than 10 days, or disposed on site? Yes ___ NA__ No

(If Yes, the TSD checklist must also be completed.)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

1.	Does the waste analysis plan address the follower (40 CFR 264.13(b)(6) and 265.13(b)(6)]	ollowing LDR w	aste categories	?
	F001-F005 Spent Solvents	Yes	No	NA.
- &	F020-F023 and F026-F028 Dioxins	Yes	No	NA
	California List Wastes	Yes <u>√</u>	No	NA
	First, Second, and Third Third Wastes	Yes <u>√</u>	No	NA
	Comments			
2.	Has the waste analysis plan been revised to	o address F039 n	ulti-source lea	chate?
	Yes_ No_ NA_			
3.	What date was the waste analysis plan last	revised? <u>21</u>	191	
4.	Does analytical data contain all the inform			r dispose
	restricted wastes? [40 CFR 264.13(a)(1) a	mr 503-13(E)(1)		
	Yes No	BU 203-13(E)(1)		
				ne may
√ de	Yes No	f analytical data	? (More than o	one may
4. 44 	Yes No If yes, which of the following are sources of apply.): Generator provides data	Canalytical data boratory GL/G	? (More than o	e.
-1, 4* -1, −1, −1, −1, −1, −1, −1, −1, −1, −1, −	Yes No If yes, which of the following are sources of apply.): Generator provides data Facility performs analyses in on-site is Facility contracts analyses at off-site is If the fact provides data, done the fact is the fact in the fact is the fact in the fa	Canalytical data boratory GL/G	? (More than o	e.
4. 44 	Yes No If yes, which of the following are sources of apply.): Generator provides data Facility performs analyses in on-site is Facility contracts analyses at off-site is CFR 254.13(a)(2) and 263.13(a)(2)]	canalytical data boratory GL/G boratory	? (More than o	ting? [40
	Yes No If yes, which of the following are sources of apply.): Generator provides data Facility performs analyses in on-site is Facility contracts analyses at off-site is CFR 254.13(a)(2) and 265.13(a)(2)) Yes: No NA	boratory GL/G boratory childy provide con labe EHS LA displacified in 4 ching procedure	CFR 268.41	ning? [40

		test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]
	b.	Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]
		Yes No NA
		"See Appendix C for exceptions.
		If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]
	c.	Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? [40 CFR 268.32(i)]
		Yes No NA
		If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR-264.73(b)(3) and 265.73(b)(3)]
Oper	ating Re	cord [40 CFR 264.73 and 265.73]
1.	specifi	he operating record contain records and results of waste analyses performed as ed in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and (b)(3)]
	Yes	<u> </u>
2	Does t	
	Yes	Z 16
		s both those received from generators, and these-propered for eff-site shipments.
3.	which	he operating record include appropriate documentation for restricted wastes: are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and (b)(12), (14), and (16)]
	Yes y	No NA

B.

	managemen	it of wastes pre	liscussed in points 2. and 3. reflect proper historical evicusity covered under expired national capacity variances, and the soft hammer provision?
	Yes	No	NA <u>V</u>
	trestment sta	ne soft hammer pi pridents establish poity variance to	rovision expired as of 05/08/90. Soft harmer wastes which had hed in the Third Third rule were granted a minimum 90-day o 08/08/90.
Stor	age [40 CFR 26	58.5 0]	-
1.	•	_	ored on site in containers?
	Yes 🗸	No	(If No, go to 2)
	*See Appundis	E for distinct	ion between restricted and prohibited wastes.
	Are all cont storage? [40	ainers clearly n CFR 268.50(a	narked to identify the contents and date(s) entering a)(2)(i)]
	Yes 🗸	No	
		s been stored fo went into effec	or more than one year since the applicable LDR
	Yes	No 🗹	(If No. go to 2)
	Can the faci recovery, tre	llity show that s	such accumulation is necessary to facilitate property posal? [40 CFR 268.50 (c)]
	Yes	No	
	If yes, state	bow:	
2	Are prohibi	ied wastes stor	red on site in tanks?
	Yes 🗸	No	(If No, go to 3.)
	bazardous v	recorded and	ed with a description of the contents, the quantity of each and date each period of accumulation begins, or is such maintained in the operating record? [40 CFR
	Yes 🗸	No	
	Have tanks west into e	been emptied	at least once per year since the applicable LDR regulation
	V~ V	Ma	(If Yes, en to 3.)

				posal? [40 CFR	268.50(c)]	ram brobet	
		Yes	No				
		If yes, state he	ow:				
	3.	Does the facili			ste containing PCBs at	concentrations	
		Yes	No 🗸	(If No, go t	o D.)	•	
		Does the facil	lity meet the	TSCA criteria in	40 CFR 761.65(b)? [4	40 CFR 268.50(1)]	
		Yes	No				
		Have these w	astes been ste	ored for more th	an one year? [40 CFR	268.50(1)]	
		Y¤	No				
D.	Trest	ment					
	1.	Does the facil	ity treat resti	ricted wastes oth	er than in surface impo	oundments?	
		Yes 🗹	No	(If No, do r	not complete this section	on. Go to E)	
	2.	Are required specified in 4	technologies CFR 268.42	used to treat wat? [40 CFR 268.	ustes which have treatm .40(b)]	nent standards	
		Yes	No_	NA	(If Yes or NA, go	to 3.)	
		Was an altern	ative method	approved?			
		Yes	No	FUEL B	LENDING		
		List each was method. Che 268.42(b)]	te code, the t ck if approva	echnology speci i of the alternati	fied in 40 CFR 268.42, ive method is documen	and the alternative sted. [40 CFR	
	سيغف	Waste Code.	Required 7		ternative Mathod.	Assertal	
							-
	•	Tab pooles 16	- 14			- de costar antiduas	-
	3.	from lab pack	s containing : with the sub	D004, D005, D 0	ords are specified, are is 206, D007, D008, D010 at standards for these c	, and DOIL treated:	?
		Yes	No	NA			

4.	Desc	ande all other w	raste codes an	d treatment processes:	
		RIOUS CH	EMICAL >	PHYSICAL	
		₹ £	AKATION I	FOLLAWED BY DING	
5 .	Char	acteristic waste	3:		·
		e 40 CFR Part ? acteristic level?		t standard lower than the	e 40 CFR Part 261
	Yes	No_			¹⁰ Ø − v ¹⁰
	end 2	amplies to both 68.43, and to so cteristic level.	ne 40 CFR 248.4	iz required methods which	esocified in 40 CFR 248,41 result in treetment below the
	treat			e waste as restricted unt n after the waste is rend	ni 40 CFR Part 268 ered non-hazardous? [40
	Yes .	No_	_		
	Com	menu			
6.	Dilui	ion Prohibition	(40 CFR 26	B.3]:	
	2.		•		rent treatment standards?
		Yes 🗸	No	(If No, go to c.)	and the second s
		List the wast	es LISTED	solvenst doon w	HOTES (FUELDING)
	b.	Are the was	ies amenable	to the same type of trea	tment? [55 FR 22666]
		Yes 🗹	No		
		If yes, is this	method used	for the aggregated was	es?
		Yes	No		A CONTRACTOR OF THE PARTY OF TH
		Comments_			and the same
	c	Based on an is dilution w	assessment o sed as a substi	of points a. and b., or any itute for treatment? [40	other relevant information,. CFR 268.2(2)
		Yes	No		
		Comments			

Yes <u>~</u>	No		
Comments			
Does the faci		haracteristic wastes which scility?	have been rendered no
Yes	No <u></u>	(If No, go to 9.)	-
Complete the	following tab	le:	
Waste Code	Rece	iving Facility	.max.
	-		
			sa
		tification for each shipmed State? [40 CFR 268.9(
Yes	No		
Does the facil	ity ship any w	ssies or treatment residu	
Does the facility?	ity ship any w		
	ity ship any w	(If No. 50 to 10.)	
Does the facil facility? Yes	ity ship any wi No <u>~</u> following tabl	(If No. 50 to 10.)	
Does the facility? Yes Complete the	ity ship any wi No <u>~</u> following tabl	(If No. g o to 10.) le:	
Does the facility? Yes Complete the	ity ship any wi No <u>~</u> following tabl	(If No. g o to 10.) le:	
Does the facilifacility? Yes Complete the Waste Code	No	(If No. 50 to 10.) le: iving Facility	ONLY NON-HAZAM TANK BOTTOMS lead disposal facility with
Does the facilifacility? Yes Complete the Waste Code	No \(\square\) following table Recent tion and a certain? [40 CFR 2	(If No. go to 10.) le: iving Facility	ONLY NON- HARM TANK BOTTOMS land disposal facility will \$2.7(0)(3))
Does the facilifacility? Yes Complete the Waste Code Are a notificat waste shipmer	No	(If No. 50 to 10.) le: iving Facility	ONLY NON- HATTANIA TANK BOTTOMS land disposal facility will \$2.7(0)(3))

		combiere me	tonowing ran	ole:	
		Waste Code	Rece	ziving Facility	
		VARIOUS	OHM -	GEORGIA S - LOUISIANA	
				potifications and certifications provided to the recomment? [40 CFR 268.7(b)(6)]	ziving
		Yes 🗸	No		
E	Surf	ace impoundmen	its [40 CFR 2	268.4]	
	1.	Are restricted	wastes placed	ed in surface impoundments for treatment?	·
		Yes	No 🗹	(If No. go to F.)	
		List	Carrie		
	2.			n the only recognizable treatment occurring in the (68.3(a) and 268.4(b))	surface
		Yes	No		
		Comments	e, Carlos de Car		
	3.	Has the facility compliance wirequirements?	th minimum w	to the Agency a waste analysis plan and certification technology requirements and ground-water monitors. (a)(4)]	n of oring
		Ys	No		
	4.	granted for the	at unit? [40°C	requirements have not been met, has a waiver been CFR 268.4(a)(3)(4))	:0
		Yes	No	The second secon	
	5.	tested separati	ely, acceptably Bed in the was	s of sludge and supernatural from the surface imporely, and in accordance with the sampling frequency sate analysis plan? (Attach test results.) [40 CFR	indment and
		Yes			
	6.	Does the oper performed in a 265.73(b)(3)]	ating record a	adequately document the results of waste analyses with 40 CFR 268.4? [40 CFR 264.73(b)(3) and	j
		Yes	No		
		Comments			

	Sludge Supernatant	Ys	No	Waste Code Waste Code	
				ed on treatment resid	
					
3.	If sludge resi an annual ba	idues exceed tr usis? [40 CFR :	eatment stands 268.4(a)(2)(ii)]	rds/prohibition level	i, are they remov
	Yes	No	NA	es de la companya de	Surger Sport for
	Comments				
	Are residues 268.4(a)(2)(s subsequently iii)]	managed in and	other surface impoun	dment? [40 CFR
	Yes	No			
9.	greater than	nt is determine impoundment No	volume? [40 (atment standards, is FR 268.4(a)(2)(ii)]	annual throughpu
			17A	್ ಭಮ್ಮವಾಕರಣ	The second secon
	Commenu		and the second second		
				A STATE OF THE STA	
Lan	i Disposal				
	Are restrict	ed wastes place	ul in or on their	and in units such as i	andfills, surface beds, mines/caves
	Are restrict	ed wastes place ents", waste pik uits, or bunker	ed in or on the les, land treatments? [40 CFR 26]	land in units such as l not units, salt domes/ 1.2(c)] to G.)	andfills, surface beds, mines/caves
	Are restricted impoundment concrete values	ed wastes place mus", waste pik uits, or bunker	ed in or on the les, land treatments? [40 CFR 26]	and in units such as interesting the second	andfills, surface beds, mines/caves
	Are restricted impoundment concrete values Yes	ed wastes place ents*, waste pik uits, or bunker No or include surfa	ed in or on the es, land treatme s? [40 CFR 26] (If No. 50) se (specification	land in units such as l not units, salt domes/ 1.2(c)] to G.)	andfills, surface beds, mines/caves
	Are restricted impoundment concrete values Yes There we restricted impoundment values Yes	ed wastes place ents*, waste pik uits, or bunker No or include surfa- ify which units	ed in or on the es, land treatme s? [40 CFR 26] (If No. 50) se (specification	land in units such as l not units, salt domes/ 1.2(c)] to G.)	andfills, surface beds, mines/caves
	Are restricted impoundment concrete values Yes	ed wastes place ents*, waste pik uits, or bunker No or include surfa- ify which units	ed in or on the es, land treatme s? [40 CFR 26] (If No. 50) se (specification	and in units such as lest waits, salt domes. 1.2(c)] to G.) constant in g.	andfills, surface beds, mines/caves
	Are restricted impoundment concrete values Yes There we restricted impoundment values Yes	ed wastes place ents*, waste pik uits, or bunker No or include surfa- ify which units	ed in or on the es, land treatme s? [40 CFR 26] (If No. 50) se (specification	and in units such as interesting, salt domes. 8.2(c)] to G.) consistent in g.	
Lane 1. 2.	Are restricted impoundment on concrete values. Yes The property of the first point of the first poin	ed wastes place ents*, waste pik uits, or bunker No or include surfe ify which units. it	ed in or on the es, land treatments? [40 CFR 26] (If No., go on topoutagether and what what when the end to ensure the e	and in units such as a part units, salt domes/ 1.2(c)) to G.) and the gradient and a salt annihilation and annihilation are annihilation and annihilation are an annihilation are annihilati	
1.	Are restricted impoundment on concrete values. Yes The property of the first point of the first poin	ed wastes place ents*, waste pik uits, or bunker No or include surfe ify which units. it	ed in or on the es, land treatments? [40 CFR 26] (If No., go on topoutagether and what what when the end to ensure the e	and in units such as a part units, salt domes/ L2(c)) to G.) are constant, the graph and companies	

Yes No NA **sets: A waste new exceed a characteristic level only if the treatment attendard for that characteristic has been net. 4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(e)? [40 CFR 264.73(b)(3) and 265.73(b)(3) Yes No If yes, at what frequency are analyses performed? If yes, at what frequency are analyses performed? So No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C)	J.			CFR 268.9(c)]
4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)] Yes No [If yes, at what frequency are analyses performed? If yes, at what frequency are analyses performed? Solves the facility land dispose of restricted wastes which are not prohibited? Yes No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C) Case-By-Case Extension (40 CFR 268.5) No-Migration Petition (40 CFR 268.4) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.44) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension most the requirements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described is reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		Yes	No	NA
performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 263.73(b)(3) Yes No If yes, at what frequency are analyses performed? If yes, at what frequency are analyses performed? So No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C) Cate-By-Case Extension (40 CFR 268.5) No-Migration Petition (40 CFR 268.6) Treatment Standard Variance (40 CFR 268.44) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		*Nete: A w	este may exceed a t characteristic (characteristic level only if the treatment standard for has been met.
If yes, at what frequency are analyses performed? If yes, at what frequency are analyses performed? Yes No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C)		performed	in accordance w	with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and
S. Does the facility land dispose of restricted wastes which are not prohibited? Yes No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C)				
Yes No (If No, go to 6.) List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C)		If yes, at w	hat frequency as	re analyses performed?
List waste codes in appropriate category below: National Capacity Variance (40 CFR Part 268, Subpart C) Case-By-Case Extension (40 CFR 268.5) No-Migration Petition (40 CFR 268.6) Treatment Standard Variance (40 CFR 268.44) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the regularements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described is reports to the Regional Administrator? Yes No NA Are restricted wastes placed in underground injection wells?	5.	Does the fa	acility land dispo	se of restricted wastes which are not prohibited?
National Capacity Variance (40 CFR Part 268, Subpart C) Case-By-Case Extension (40 CFR 268.5) No-Migration Petition (40 CFR 268.6) Treatment Standard Variance (40 CFR 268.44) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		Yes	No	(If No, go to 6.)
Case-By-Case Extension (40 CFR 268.5) No-Migration Petition (40 CFR 268.6) Treatment Standard Variance (40 CFR 268.44) Does the operating record contain records of the quantities, date of placement, copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10)] and 265.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described is reports to the Regional Administrator? Yes No NA Are restricted wastes placed in underground injection wells?		List waste	codes in approp	riate category below:
copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)] Yes NA Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the requirements in 40 CFR 268.5(b)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		Case-By-C	ase Extension (4	40 CFR 268.5)
Do land disposal units receiving wastes covered by a national capacity variance of case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)? Yes No NA If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		copy of the restricted v	generator notification	fication [40 CFR 268.7(a)(3)] for each shipment of a case-by case extension or no-migration petition? [40
Yes No NA If the facility has a case-by-case extension, is progress being made as described is reports to the Regional Administrator? Yes No NA Are restricted wastes placed in underground injection wells?	•	Yes	Ma	NA
Yes No NA If the facility has a case-by-case extension, is progress being made as described is reports to the Regional Administrator? Yes No NA 6. Are restricted wastes placed in underground injection wells?		Do land di case-by-cas	sposal units rece se extension me	tiving wastes covered by a national capacity variance or et the requirements in 40 CFR 268.5(h)(2)?
Yes No NA NA Are restricted wastes placed in underground injection wells?				- 1987年
6. Are restricted wastes placed in underground injection wells?		If the facili	ity has a case-by the Regional Ac	case extension, is progress being made as described in deministrator?
•		Yes	16	NA
•	6.	Are restric	ted wastes place	ed in underground injection wells?
		Yes	No	List

Othe	r Wastestreams
1.	Does the facility generate wastes other than residues from RCRA treatment units?
	Yes V No (If No, go to H.)
2	On-Site Management
	a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]
	Yes No NA
	b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]
	Yes No NA
	"This applies to both concentration based treatment standards specified in 40 CFI 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix 9.
3.	Off-Site Management: Waste Exceeds Treatment Standards
	Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?
	Yes No (If No, go to 4.)
	Identify wastes code(s) and off-site treatment or storage facilities to which wastes a
	VARIOUS HES-INDIANIAPOCIS IND. TWE-SAUGET ILL. ROSEING- LOUISIANA-
	Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]
	Yes V No (If No. 20 to 4.)

G.

					i for the packs, is the certification with the notification?	i
	Yes,	N	°-	NA_		
4 .	Off-S	Site Manager	nent: Waste	s Meets Treatme	ent Standards	
	•		s that meet t sposal facility		rds/probibition levels shipped to	an.
		Yes	No_ <u>v</u>	(II No, 1	go to 5.)	
		Identify w	aste code(s)	and off-site dispo	osal facilities:	
		Wasi	e Code	Receiving Facili	in the second se	
		Are LDR disposal fa	notifications cility? [40 C	and certification FR 268.7(a)(2)(i	s provided for each shipment to and 268.7(a)(2)(ii)]?	the
		Yes	No	(If No. 1	to to b.)	
	b .			es which have be upped to a Subtit	en rendered non-hazardous (in a de D facility?	The second second
		Yes	No	NA	(If No or NA, go to 5.)	
		Complete	the following	g table:		
		Wast	e Code	Receiving Facili	X	
						•
		Are a potif	ication and a tor or autho	a certification for rized State? [40	each shipment sent to the Regio CFR 268.9(d)(1) and 268.7(b)(5	mel . 5)?
•		Yes	No	•	()(=) ==== ===(-)(-)(-	•

NA S	. Of	Site Management: Wastes Subject to Variances, Extensions, or Petitions
•	•	Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?
		Yes No (If No. go to 6.)
		Complete the following table:
		Waste Code Receiving Facility
	_	
	b.	Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]
		Ym No
6.	Dilut	ion Prohibition [40 CFR 268.3]:
	٤.	Are prohibited wastes with different treatment standards mixed?
		"See Appendix E for distinction between restricted and prohibited vestes.
		Yes No (If No, go to b.)
		List the wastes USTED SOLVENTS + IGNITHALE WASTES
		Are the wastes amenable to the same type of treatment? [55 FR 22666]
		Yes No
		Comments INCINERATION, FUEL BLENDING
	_	
	b.	Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
		Yes No (If No, go to c.)
		Check appropriate category:
		Dilutes to meet treatment standards

	Managed in treatment systems regulated under the Clean Water AcNon-toxic* characteristic wastesTreatment standard specified in 40 CFR 268.41 or 268.43
	"Hon-texic = 0001 (except high TOC normestewaters), 0002, and 0003 (except or out sulfides). (55 FR 22666)
	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
c.	Based on an assessment of points a, and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]
	Yes No
	Comments
Additional C	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional C	
Additional C	
Additional C	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional C	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional	Comments, Concerns, or Issues Not Addressed in the Checklists
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Additional	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional	Comments, Concerns, or Issues Not Addressed in the Checklists
Additional	Comments, Concerns, or Issues Not Addressed in the Checklists

Illinois Environmental Protection Agency Division of Land Polittion Control

PCRA INSPECTION REPORT

USEPA #: IL	703.	534	93	64	IEPA #	y: Q 3		ć <u>a</u> c		
Facility Name: #	ERITAGE E	NVIBONA	ENTA	L SERV	1665	Ph	ione #: 7	08 73	9 11	5-/
Street Address:	CANAL	ANK	RO .	NE				OOK	-	
	YONT					tate: /	L	Zip: 60	2439	7
Region: 2		Inspecti	on Date:	: 312	<u>42</u>	Fr	om: 9	BO AMTO:	: 130	P~1
Weather: 3	00/-									
			7	YPE OF FA	CILITY					
Notified As: G/7	-R/T50/W	AF LOSE	-/501	ح	Regulat	ed As: G	TR/T	D/WAI	FLORE	- ISOF
LDF1	HPV? N			/U Requir	ed?:	YED		NO		_
			אינ	PE OF INS	PECTION					
CEI:	Sampling:		Citizen	Complain	ıt:	Close	d:	Other	r:	
CME/O&M:	Record	Review:		Follow	v-Up to Ins	pection of:		_ Withdraw	vai:	
			NON	-REGULAT	TED STATU	SNA				
SQG:		laimed Nor	handler	:		Other (S	pecify in N	larrative):		
				PARTA	1	<u>a11-</u>	6-63			
Not	ification Date	: <u>४</u> 1 <u>1</u>	91 0	o , from (f	hitial or (s			n.		
Initial Part A Dat	•: <u> </u>	2181				Amended:	/	/		
Part A Withdraw	al requested:	/_	_/_	-	A	pproved b	(US)(IL) E	:PA:/	<u>'/</u>	
			PART	B PERMIT	T APPLICA	TTON				
Part B Permit Sub	mitted: (Y) or	N 1	11/0	1 88		Final Pern	nit Issued:	/_	_/	
			E	NFORCEA	IENT					
Has the firm been	referred to -			US	EPA: (Y) or	N 41	1185			
Illinois Attorney Ge	eneral: Y or	<u>(4)/</u>				Attorney:			7	-
			-	RDERS IS	SUED					
CACO: 4	1 1 1 85	(CAFO:	9 12	6185	Conse	nt Decree:		/_	
Federal Court Orde	pr:/	_/ s	tate Cou	urt Order:	/	_/ IF	CB Order:	/_	_/_	
			TSD FAC	CILITY ACT	TVTTY SUM	IMARY				
Activity by	OnPan	NG MAN CON	S JOST PE	SALDONE)		Societaes, E	xempt per		On Annual	l Report
Process Code	OUL	MCS W SHOT	Ma E		See See	1870 3	IAC, Sec.	1991	19 90	19 89
501	Y	N	Y	N	1 4	1	1A	1 4	Y	4
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						1504 (D	LDC	1	}	1

	PERSON(S) INTERVIEWED	IIILE	PHONE #
	BOB GARCIA	PLANT MER	7087391151
L			
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Ī			

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
JAMES HAENNICKE	IEPA/EPS	702531590U
<u></u>		
PREPARED BY	AGENCY/TITLE	PHONE #

SUMMARY OF APPARENT VIOLATIONS

Pres Cles	Section		Mes	Class	Section
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West Here lively	a wor			/	<i>T</i> /				(Circ	On Ann Report fo cle if pres	or: sent; rospet)	of Generation	A Marite stand Striptners
HAZ WASTE FYEL	16NITABLE IFW	2-11-42	Pail- 5	4	4	G F	G	F G	F	45000	1000 000 6ALS/YA	3-12-92	CONTINCATAL MENT
WASTE PETROLEUM NAPHTHA	2 PARTS WAGHERS	RNOW	De c 1			G	(G)	F	F	NONE	1446 ms/ YR	NA	GLENDE HU
WASTE FLAMMBLE SOLIDS	SPILLS, KEMED PROJETS, STRAINER CLEAVINGS FROM 2" FUEL BY ENDING		Pai 4 Four-5			G) F	G	F)		50.00 5 185	40600 ibs/14	217-92	BATON ROdice _ A
LAB PACK S	OFF SIFE CLEAN CIPS	INVENTORY SPECTS	VRIES			G	G	G F		80 VRUMS	HO DRUMS! MONTIT	3-16 92	HES- WOIALALLIS N
41576-P HA 2AR DOUS WATER	OFF-SITE	W4/4C Krow	VARIES			G)	(G)	G F) F) 0	20000 LALS/4R	2-19-92	BATON F. Ja. A
TEMP. STORAGE	NOTREATED ONSHE	QA/GK	UARIE S			G	3	F	F) braws	PO DEUMY MONTH	3-1792	CWM - BANG F. AL
501105	TANK KOTTOMS, SUIL, PASTIC DRUMS	21092	NA	NA	NA	G	G	F G	F	0	20 pas 3/	3-1892	CID VALOTIVE
WATE OIL; OIL/WATER MIXTURES	CANT BE TREATED ON-SITE	1-6.92		1.	1	G	G	F G	F	130000 6 ML S	7100000U 6165/4A	3-19-42	HES - INDIANARIS IN
TREATMENT WATER	SEPARATION OF WASTE DIL + WATER	11-2 741				G	G	F G	F				1
CRUSHED ORUMS	EMPTIES	NA			V	G	G	F G	F	20ydi3	20 y153/ MOUTIT	3-1292	RECEIVE CHILACUIL

NO responses must be explained in narrative.

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NARRALLVE

Heritage Environmental Services (HES) is currently operating two divisions at the Lemont facility. The first of these is the Treatment Flant which includes the storage and treatment of hazardous wastes. The second division is Petroleum Management, whereby HES picks up waste oil from off-site generators on a multi-stop permit. The transportations at HES are a part of the Petroleum Management division, however manifests are kept at HES's Indianapolis, IN facility.

Industrial oils are accepted from off-site generators and processed to produce waste oil fuel. Approximately 90% of the fuel is on-spec and snipped to facilities such as Ameropan-Chicago, IL and North Vernon Forge- North Vernon, IN. The remaining 10% of fuel is off-spec and either mixed with the hazardous waste fuel or sent to HES in Indianapolis, IN for treatment along with residual water and the rag layer (oil/water).

Low flash wastewaters are treated by de-watering or separating the phase layers. The fuel layer is blended into hazardous waste fuel while the non-hazardous waste is shipped to HES in Indiana for treatment.

Inks, paints, and solvents are accepted for hazardous waste fuel blending. Fuel with acceptable BTU value is shipped to cement kilns such as Systech- Greencastle, IN and Continental Cement- Hannibal, MO. Residual sludge and strainer cleanings from this process are snipped to an off-site incinerator as hazardous waste.

HES receives drums of waste for temporary storage from off-site generators. These wastes are mainly corrosives, plating wastes and other inorganic wastes. These, along with heavy hazardous waste fuels which cannot be treated on-site, are shipped to HES in Indiana for treatment.

Lab packs are also accepted by HES from off-site generators. These wastes are temporarily stored prior to shipment off-site for incineration or treatment.

HAZARDOUS WASTES GENERATED

Hazardous waste fuel- F001-5, K086, D00X, Varies- Produced from ignitable hazardous waste and non-hazardous waste oil. Approx 1 million gallons/year generated and shipped to Continental Cement- Hannibal, MO or Systech- Greencastle, IN (cement kilns); or OHM- Georgia (fuel blending). About 45,000 gallons currently on-site.

Taste petroleum naphtha- D001- From 2 parts washers. Approx 144 gallons/year generated and blended into hazardous waste fuel on-site.

whiste flammable solids FUUL-5, DUUL-Spills, Famour than provided strainer cleanings from secondary fuel blending. Approx 40,000 pounds/quarter generated and shipped to Rollins Environmental-Baton Rouge, LA. About 5,000 pounds currently on-site.

Lab packs- Various waste codes- Approx 40 drums/month generated and shipped to HES- Indianapolis, IN. 80 drums currently on-site.

Listed hazardous water- Various waste codes- Hazardous wastewater from off-site generators. Approx 20,000 gallons/year generated and shipped to Rollins Environmental- Baton Rouge, LA. None currently on-site.

Temporary storage waste- Various waste codes- Mainly inorganic wastes not treated on-site. Approx 80 drums/month generated and shipped to themical Waste Management- Emelle, AL. 100 drums currently on-site.

NON-HAZARDOUS WASTES GENERATED

Waste solids- Tank bottoms, soil, plastic and steel drums. Approx 100 cubic yards/quarter generated and shipped to CID Landfill- Calumet City, IL. 20 cubic yards currently on-site.

Waste oil & oil/water mixtures- Waste that cannot be treated on-site. Over 1 million gallons/year generated and shipped to HES- Indianapolis. IN. About 130,000 gallons on-site.

Treatment water- Reaction water from the separation of waste oil and water. Amounts included with above wastestream.

HAZARDOUS WASTE UNITS

SU1- Container Storage

- Area 1- Container Storage/Processing Building Concrete foundation with coated storage bays Capacity- 456-55 gallon drums + 1-220 gallon Tote = 25,300 gals
- Area 2- Diked Concrete Pad Capacity- 260-55 gallon drums = 14,300 gals
- Area 3- Van Trailers (10)
 Capacity- 800-55 gallon drums = 44,000 gals

502- Tank Storage

Tanks are located in a tank farm with a concrete floor and walls

- VRT 1-4 Initial vacuum receiving tanks
- CB 1-4 Cone bottom gravity separation tanks
- SF 1-7 Supplemental fuel storage tanks

Fol- ireatment in Tanks

Tanks are located in a tank farm with concrete floor and walls HT 1-5 Oil/hydrocarbon heat treatment tanks

T04- Other

Not occurring at the time of this inspection.

VIOLATIONS

- 722.134(a)(3)- Words "Hazardous Waste" were not marked on portable vacuum receiving unit.
- 725.173(b) Discrepancy in operating record. Actual number of drums in diked area did not match amount on inventory sheet.

Both of the above violations were resolved during the inspection.

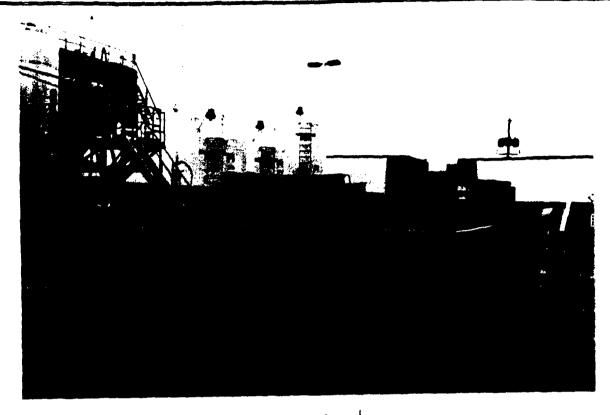
NOTES

- 1- It appears from information in past inspection reports that HES is operating in compliance with a CAFO issued on 9-26-85.
- 2- On 1-6-92 HES implemented their contingency plan in response to a small fire in the new drum storage and processing building. No injuries and minimal property damage occurred. No waste materials were involved since this structure was not yet in use. A report was submitted to the Agency in compliance with 35 IAC 725.156(j).
- 3- At the time of this inspection, Heritage Environmental Services is operating as a fully regulated generator as well as a treatment and storage facility.

PPS OF ANYPOR RIVER

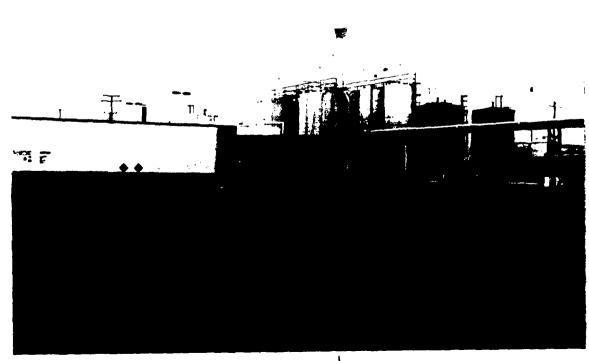
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NAME: YERSTAGE ENVIRONMENTAL SERVICES SITE 8: 031 1620007 : 3-70 42 TIME: 930AM-130PM PROTOGRADIO BY: TAMES HAEWNICKE.



comments: 5- DIKED CONCRETE PAD (501)

Roll #: 92 . 284 Photo #: 5

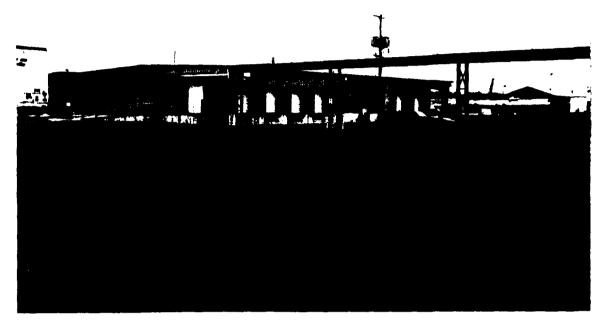


E - VAN TRAILERS -10 (SOI)

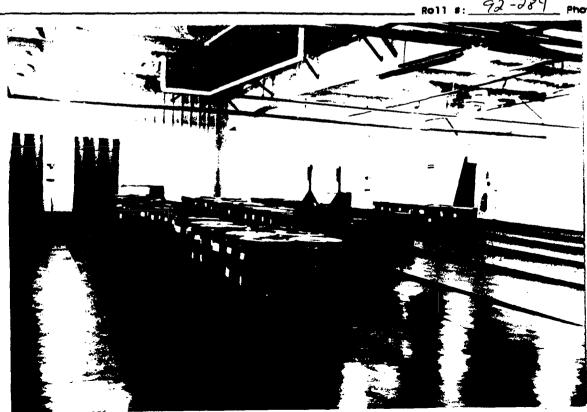
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Site Name:			·		
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CONTAINER STORME / PROCESSING BUILDING (501)



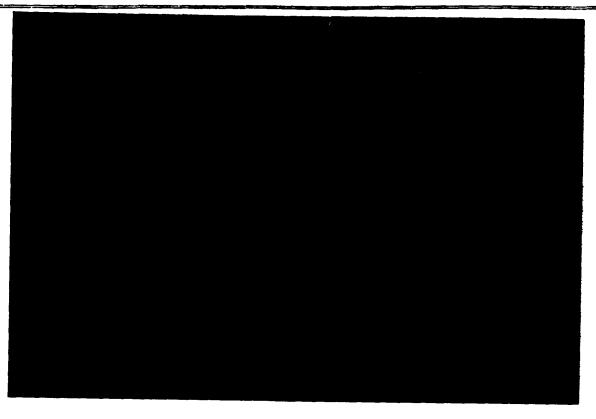
5 - INSIDE CONTAINER STORAGE / PROCESSING BUILD ING (501)

1011 9: 92-2PU

Illinois Environmental Protection Agency Photographs

Site Name: YES FOR ENVIRONMENTAL SERVICES SITE 8: 4 19 3 19 7

Date: 3-70 12 Time: 930AM-130PM Photograph By: TAMEC HACKICKE



Comments: 5- 2 PARTS WASHERS

Roll #: 92-294 Photo #:

Comments: NW - PORTABLE VACUUM RECEIVING UNIT - WOLDS "HAZADOUS

Area	Cless	90 Day	Key Ltr	Requirement	In Ap	parent liance?	pplicable	Remarks or Comment No.
	0	F/U Req	Sub Sec		Yeş	No	Not A	
				PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status				
ОТН	1			Section 703.150: Application by Existing HMM Facilities and Interim Status Qualifications	Y			·
			a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				 Six months after the date of publication of regulations which firstic require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? first yes No N/A Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? 				·
IEPA/DLPC	- 8 APR 1992	RECEIVED		Yes No N/A 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A _ & M				
	14		. :	i EP Nict ill } lax				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		pparent pliance? No			Remai	rks or Con	nment No
OTH	1 ′			Section 703.151: Application by New HMM Facilities For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes No Is the facility only operating with a RCRA permit? Yes No NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			✓ 	Nor	A	NEW	FACILITY
ОТН	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes No N/A 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	~						

Area	Class	90 Day F/U	Key Ltr Sub	Requirement		operent olience?	Applicable	Remarks or Comment No.
	:	Req	Sec		Yeş	No	Š	
ОТН	1		,	Section 703.154: Prohibitions During Interim Status	V			
				During interim status, has the facility refrained from:				
		,	a	 Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No 				
			b	 Employing processes not specified in Part A of the permit application? Yes No 				
			c	 Exceeding the design capacities specified in Part A of the permit application? Yes No 				
НТО	1			Section 703.155: Changes During Interim Status	V			
			đ	NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes \(\sum \) N/A \(\text{NO} \) N/A				
				建水 灌 化水 (

REVISION 1 (8/15/88)

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	< <	Remarks or Comment No
-					Yeş	No	No	
				PART 722 GENERATOR STANDARDS Subpart A: General				
НТО	1			Section 722.111: Hazardous Waste Determination	V	ļ		
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes No		: - -		
				Did the generator follow the procedures specified in this section in making its determination? Yes No				
ОТН	1	i I		Section 722.112: USEPA Identification Number		<u> </u>		
			a	Has the generator obtained a USEPA identification number? Yes No				
			С	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes No				
) 				E L		
						}		
						}		
L	L				L	<u> </u>	<u> </u>	L

PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Mote: If the generator has not used a manifest, check TWO in the Apparent Compliance Column and skip to 722.130. b Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No No No: \$\frac{1}{2}\$ No: \$\f	nent No
Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No	
hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check noted in the Apparent Compliance Column and skip to 722.130. b Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous	.
Mote: If the generator has not used a manifest, check Tho in the Apparent Compliance Column and skip to 722.130. b Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous	
which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous	
facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous	
waste to the primary designated facility.	
d In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to	
return the waste? Yes No	
TC.	

		90	Key		In An	parent	cable	
Aree	Class	Day F/U Req	Sub Sec	Requirement		liance?	Not Appl	Remarks or Comment No
MAN	2			Section 722.121: Acquisition of Manifests	V			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?				
			}	or				
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A				INDIANA MISSOURI LOUISIANA
MAN	2			Section 722.122: Number of Copies				
	·			Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			Section 722.123: Use of the Manifest	<u>~</u>		+	
ŀ			ļ	For each manifest received, has the generator:				
				1) Signed the certificate by hand? Yes No				
				2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		perent liance? No	Not Applicable	Remarks or Comment No.
	A TOTAL TOTA		b c d	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest fs. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes No N/A Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes No N/A				NO BULK SHIPMENTS BY WATER OR RAIL
1, 4			A COLUMN TO THE A COLUMN TO THE ACCOUNT OF THE ACCO		,			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance?		Remarks or Comment No
отн	1	х	360	PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site		NU	×.	NO WASTE READY FOR TRANSPORTATION OFF SITE
ОТН	1	x		packaged in accordance with 49 CFR, Parts 173, 178 and 179? Section 722.131: Labeling			<u> </u>	
ОТН	1	х		Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172? Section 722.132: Marking	! !		\	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes No				
				- The manifest document number associated with the container? Yes No - The words "Hazardous Waste - Federal Law Prohibits				
				Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No		<u> </u>		\bigvee

Area	Cless	90 Day F/U	Key Ltr Sub	Requirement	In Appli		Applicable	Remarks or Comment No.
тн		Req	Sec	Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to:	Yeş	No	Not	GENERATOR IS ALSO A TRANSPORTER; DYMERWISE, TRANSPORTER
	A CAN THE PROPERTY OF THE PROP	And the second s		- Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.				SUPPLIES PLANAROS
	to be seen that the second of	X and a company of the company of th		Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				Webselm Labor Over South Colors
		and the second s		For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				
	1	4		GEN-C-2				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
отн	2		a	PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years: - A copy of each signed manifest?	\		ζ.	
			b b	Yes No No A copy of each annual report? Yes No No N/A Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A				NONE REQUIRED
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes No N/A				NO UNRESOLVED ENFORCEMENT ACTION NO REQUESTS BY DIRECTOR

Aras	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Com	pparent pliance No	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Remarks or Communit N.
ОТН	1	X		Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.	1			ı
			al	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes No				
			a 2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes No N/A				
			a 3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes No	-	-	-	RESINED ON-5/18
			a 4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes No				
								·

Area	Cless	Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
ОТН	2			Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	✓			
MAN	1		a b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and				NO EXCEPTION RETORTS REQUIRED

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1	Req	Sec	- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A Section 722.143: Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				NO ADDITIONAL REPORTS REQUIRED

Area	Class	Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.		>	NO EXPORTS OF HAZARDOUS WASTE

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	oparent oliance? No	Not Applicable	Remarks or Comment No.
MAN	1		b1	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste Has the person importing hazardous waste met the manifest			¥	NO IMPORIS CF HAZARDOUS WASTE
				requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and				
			b2	Has the importer or his agent signed the manifest in place of the generator; and				
	; 		b2	Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A				
				Is the person importing hazardous waste using manifests obtained from the Agency? Yes No				

Ares	Class	Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	In Apparent Compliance?		Compliance?		Compliance?		ompliance?		Remarks or Comment No
			540	PART 722 GENERATOR STANDARDS Subpart G: Farmers	Yeş	No	N							
ОТН	2	X		Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:			V	NO FARMING ACTIVITY						
				 Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A 										
				 Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A 										
				NOTE: If the answer to either of the preceding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).										

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	In Apparent Compliance?		Remarks or Comment No
отн	1	Req	1	PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110: Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes No Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes No NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form. Section 723.111: USEPA Identification Number Has the transporter obtained a USEPA identification number? Section 723.112: Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes No	Yes	No	Not	FUEL BLENDING - TRANSPORTER IS ALSO A TREATMENT FACILITY TRANSPORTER IS ALSO A STORAGE FACILITY
				Yes NoV				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	in Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No
				- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes No No No NoTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.				
						ı		

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement .	parent liance? No		Remarks or Comment No
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping		Not	
MAN	1/2			Section 723.120: The Manifest System	 	IN'SA	TRANSPORTER
				Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes No Has the transporter who delivers hazardous waste to another transporter or to the designated facility:			MANIFESTS ARE KEPT AT HES IN INDIANAPOLIS

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent bliance? No	Not Applicable	Remarks or Comment No
				 Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes No 				
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes No				
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes No				
			е	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes No N/A				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes No N/A				
			g	Has the transporter who transports hazardous waste out of the United States:				
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes No				
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes No				
								V

Aree	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
MAN	1.			3) Apparently returned a signed copy of the manifest to the generator? Yes No 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes No Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes No NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes No AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND			

Aras	Class	90 Day F/U	Key Ltr Sub	Requirement	Comp	parent liance?	₹	Remarks or Comment No
		Req	Sec	3) All shipping information required by U.S.D.O.T; AND 4) The date the waste is accepted? Yes No AND Does the transporter carry this record when transporting waste to the reclamation facility? Yes No AND Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes No Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to: 1) The designated facility on the manifest? Yes No OR 2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes No N/A OR	Yeş	No	Not	

. Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
отн	2		a	3) The next designated transporter? Yes No N/A OR 4) The place outside the United States designated by the generator? Yes No N/A NOTE: A "No" answer can still be in compliance. In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes No N/A Section 723.122: Recordkeeping Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes No N/A Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes No N/A Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes No N/A		NOT JAX I	NO SHIPMENTS OUTSIDE THE U.S. TRANSPORTER MANIFESTS INDIANIAPOLIS NO BULK SHIPMENTS BY WATER OR RAIL

Area	Class	90 Day F.U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No
	:		d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes No N/A				NO SHIPMENTS OUTSIDE
			е	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes No N/A				NO UNRESOLVED ENFORCEME. ACTION
			е	OR If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes No N/A				NO REQUESTS BY DIRECTOI
				i ! : : :				
				** :				

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges			
ОТН	1			Section 723.130: Immediate Action Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes No Did the transporter who had discharged hazardous waste		✓	NO DISCHARGES PROM TRANSPORT VEHICE
ОТН	1	X		give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes No Section 723.131: Discharge Clean-Up After a discharge of hazardous waste did the transporter: - Clean-up the discharge? Yes No		∨	
				- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes No			

TR-C-1

							-	
Area	ass	90 Day	Key Ltr	. Requirement		parent liance?	pplicable	Remarks or Comment No
₹	5	F U Req	Sub Sec		Yes	No	Not A	
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery				
				NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
ОТН		x		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	V			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A				
ОТН				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	Y			
,	I	,		Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A				
НТО		x		Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	V	1-		
ОТН	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A				
				and				

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Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance ⁷	Not Applicabl	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes No N/A		2	
	11		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes No N/A			
	I		С	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes No N/A			
	I		đ	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes No N/A			
	II		е	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes No N/A			
	II		е	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes No N/A			
	11		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes No N/A			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	In Appare Compliand	Not App	Remarks or Comment No
ОТН				Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel		\ <u>\</u>	BURN H.W. FUEL
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes No N/A			
	II		b	Has the USEPA been re-notified as to the burner's hazard- ous waste fuel activities? Yes No N/A			
	I		С	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes No			
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.			
	I		С	Is the facility in compliance with 722.134? Yes No N/A			
	II		đ	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes No N/A			
	11		е	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes No N/A			

Area	Class	90 Day F U Req	Key Lir Sub Sec	Requirement	Comp	parent bliance? No	Remarks or Comment No
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used 011 Burned for Energy Recovery			
нто				Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery	V		
			b 1	Has the marketer conducted an analysis of the used oil? Yes No N/A			
				NOTE: If "No", then Subpart E applies.			
				Does the oil exceed any of the specifications listed in 726.140(e)? 109a of the specifications listed Yes No			
				MOTE: If "No", then Subpart E does not apply except for 726.143(b)(1) and (b)(6).			
	I		b2	Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes No			
	11		b3	Has the marketer re-notified USEPA as to used oil management activities? Yes No			
	II		b4	Does the marketer have an invoice system such that receiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes No			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
	11		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes No			
	11		ь6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes No N/A			
	II		ь6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes No			
ОТН				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery		\checkmark	FACILITY DOES NOT BURN USED OIL
				MOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.			
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes No N/A			
	II		b	Has the proper notification been given to USEPA? Yes No			
				MOTE: Explain your response in the remarks column.			

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent bliance?	Not Applicable	Remarks or Comment No.
	11		c d	any off-specification oil, the one-time signed certification notice? Yes No N/A If the burner blends off-specification oil so that it now meets specifications, have analyses been done?			
	11	,	e	NOTE: If "No", then Subpart E applies. Is the burner maintaining the proper records for three years (invoices, analysis, certification notices)? Yes No			
				i			

Aree	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1	F/Ú	Sec	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No	1			FACILITY DUES NOT" MANAGE THESE WASTES

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
отн	1			Section 725.111: USEPA Identification Number	V			
				Has the facility obtained a USEPA identification number?				
отн	1			Section 725.112: Required Notices			V	NO WASTE HOCEPTUD
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				FRUM FOREIGN LURCE.
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A				
ОТН	1			Section 725.113: General Waste Analysis	$ \checkmark $	1		
			al	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No				

Area	Cless	Day F/U Req	Key Ltr Sub	Requirement	Comp	parent liance?	t Applicable	Remarks or Comment No
		ned	al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No	Yeş	No	N _O	
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A				GENERATOR PROVIDES PRE-ACCEPTITIONS INFO RELIEWED AND HUY TESTED IF NEWSTARY EV. INCOMING COATS HAS QA/QC HUMLYSTE DONE ON H KILL SAMI.
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator developed a written analysis plan? Yes No MOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Apparei nplianc	t Appl	
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No			
}			b	Does the plan specify:		Ì	
				The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes No			
				2) The test methods which will be used to test for those parameters? Yes No			
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No			
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No			
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No			
				,			

Area	Cless	90 Dey F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
			Sec	6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 125.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identifi-	Tes	No	N	
ОТН	1	X		cation method includes sampling? Yes No N/A Section 725.114: Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes No	V			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No		Remarks or Comment No
			b	Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No OR 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes No Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes No NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.		Not	

	Nemarks or Comment No										•
eldesild	qA 10N		· · · · · · · · · · · · · · · · · · ·		<u> </u>	**************************************					_
In Apparent	Yes No	>									
	Hequirement .	Section 725.115: General Inspection Requirements	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:	1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health?	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment?	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards?	Is the written schedule at the facility?	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes V No	Does the schedule specify at least the following minimum inspection frequency:	- Daily inspections of areas subject to spills? YesNo	
Key Lt. Ke	Sec Sec		ro		ro .	b1	P2	P3	D4		
8 9	₹ £										
	ro	2									
80	η A	ОТН									

Area	Ciass	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
			c c d	- The items and frequencies, where applicable, called for in Sections: -			

Area	Class	Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or Comment No
				 A notation of the observations made? Yes No The date and nature of any type of corrective action? Yes No N/A 				
отн	2			Section 725.116: Personnel Training Does the facility have a training program? Yes No	V			
			al	MOTE: If "No", skip to Section 725.117, Page TSD-B-10. Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No				
			a 2	Is the training program formalized, i.e., written down? Yes No Is the program directed by a person who has been trained in hazardous waste management procedures? Yes No				
			a 3	Does the program cover, at a minimum: A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes No N/A				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				B) Key parameters for automatic waste feed cutoff systems? Yes No N/A			FACILITY DUES NOT USE THESE SYSTEMS
				C) Communications or alarm systems? Yes No N/A			
				D) Response to fire or explosion? Yes ✓ No N/A			
	! !			E) Response to ground water contamination incidents? Yes No N/A			SUCH INCIDENTS DOF
				Does the program cover the implementation of the contingency plan? Yes No			
			b	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A			
			С	Has the facility conducted an annual review of the initial training? Yes No N/A			·
			đ	Are the following documents and records being maintained at the facility:			
				1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No			

2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No 4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No e Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes No N/A OTH 1 X Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Mastes a Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction?
Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes No

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent diance? No	Remarks or Comment No
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No		
			ь	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or compling of incompatible wastes and materials being done so that it does not:		
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No		
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No		
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No		
	,			4) Damage the structural integrity of the device or facility containing the waste? Yes No		
				5) Through other like means threaten human health or the environment? Yes No		

Area	Class	Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A NOTE: A "Yes" answer is a violation of the location standard.				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				
ОТН	1	X		Section 725.131: Maintenance and Operation of Facility	V			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
:				- Air; - Soil; or - Surface water,				
				which would threaten human health or the environment? Yes No				
ОТН	1	х		Section 725.132: Required Equipment	V			
	:			Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				AL TRM
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A				PA SYSIL!
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No N/A				

Arse	Class	90 Day F/U Req	Key Ltr Sub Sec	• Requirement		oparent oliance? No		Remarks or Comment No
			c	 Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No N/A Water at adequate volume and pressure to supply 				FIRE EXTINGUISHERS SPILL STATIONS SHEETY SHOWERS
			u	water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes No N/A				
ОТН	1	X		NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment	\ \			
				Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:				
				- Communications/alarm systems? Yes No N/A			1	WEEKLY
				- Fire protection equipment? Yes No N/A				тол, тиц
				- Spill control equipment? Yes No N/A				WEEKLY
				- Decontamination equipment? Yes No N/A				₩
				NOTE: Any "N/A" answer must be explained in the Comments.				

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement .		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1	х		Section 725.134: Access to Communications or Alarm	V			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				
			Ъ	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes No N/A				THERE IS ALLOHON, MORE THAN ONE EMPLOYED ON SITE DURING EPERATING HOURS
ОТН	1	х		Section 725.135: Required Aisle Space	V		}	·
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
отн	2			Section 725.137: Arrangements with Local Authorities	V			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Area	Cless	Day F/U Req	Key Ltr Sub Sec	Requirement	 parent liance? No	Not Applicable	Remarks or Comment No
			•	1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes No N/A			LEMONT POLICE + FI. COOK G. SHERRER ELL. ESD.+
				Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A			TYPICALLY, LEMONT PERSONNEL (CLOSE) RES
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A			
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes NO N/A			SILVER CKOSS HOSPILL IN JOHET BOLING BROOK MILLS.C
			b	NOTE: Any "N/A" answer must be explained in the Comments. Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes No N/A			NO REFUSALS

Aree	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Communt No
отн	1		a	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan Is a plan available? Yes No	V			
ОТН	2		a b	NOTE: If the answer is "No", skip to 725.155. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes	<u>/</u>			

Are	Cleas	Day F/U	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	No	Not	
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No				
			С	Does the plan describe the arrangements agreed to by:				
				<pre>1) Local police and fire departments? Yes No</pre>				
				2) Hospitals? Yes 🗸 No				
				3) Contractors? Yes V No				·
	i							
				4) State and local emergency response teams? Yes No				
			d	Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes No				
			đ	Is the list of emergency coordinators up-to-date? Yes No				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes No				
			е	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes No				

Aras	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
ОТН	2		e f a b	2) A brief outline of the capability of each piece of emergency equipment? Yes \sum No 3) The location of each piece of emergency equipment? Yes \sum No Is the list of emergency equipment up-to-date? Yes \sum No Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes \sum No No NA Does the plan identify the signal to be used to begin evacuation? Yes \sum No Are alternate evacuation routes identified? Yes \sum No Section 725.153: Copies of Contingency Plan Has a copy (and all revisions) of the contingency plan: a) Been maintained at the facility? Yes \sum No b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes \sum No No No				
			<u> </u>	T<0_0_3	L	<u> </u>	L	

Aree	Cless	Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or Comment No
ОТН	2			725.154: Amendment of Contingency Plan	V		Z	
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	<pre>1) Applicable regulations are revised? Yes No</pre>				
			b	2) The plan fails in an emergency? Yes No N/A				PLAN HAS NOT FITTLED
			C	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				
			d	4) The list of emergency coordinators changes? Yes No				
			е	5) The list of emergency equipment changes? Yes No				
ОТН	2			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Remarks or Comment No
ОТН	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes No Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes No Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes No NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.	V		9-1-88 SHREDWAR EXPLUSIVE SEE MARCH 1989 INSPECTION REPORT 2 MI NOR RELEASES 1-6-92 SMALL I'VE SEEMAKI'!

	Γ		Key				- -	<u> </u>
Area	Class	90 Day	Ltr	Por diament		pparent	Applicable	Remarks or Comment No
¥	บี	F/U Req	Sub Sec	Requirement	Yeş	No	Not Ap	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting			-	
MAN	1			Section 725.171: Use of Manifest System	V			
	:			Does the facility accept waste from off-site? Yes No				
•				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No				•
			a2	Note any significant discrepancies in the manifest or each copy of the manifest? Yes No N/A				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No				
·			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				•
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				

Ares	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	, .	parent liance? No	Not Applicable	Remarks or Comment No
MAN	2		b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes No N/A Does the facility initiate shipments of hazardous waste? Yes No MOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist. Section 725.172: Manifest Discrepancies NOTE: If there are no manifest discrepancies, mark the "N/A" column. Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes No If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No				NO SHIPMENIS 139 WATER OR KAIL
L	1	İ	<u></u>	<u> </u>	I	1	1	1

Aree	Cless	Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
ОТН	2			Section 725.173: Operating Record	<u>/</u>			
			a	Does the owner or operator have a written operating record at the facility? Yes No				
			b	Is the information in the operating record being main- tained until closure of the facility? Yes No				
			b	Does the operating record contain the following information:				
				 A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No 				# OF CONTAINS. DISCRUPATION SOI W. DISCRIP
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes \(\sum \) No			-	FARM- RESIDENTIAL
				3) The location of each hazardous waste within the facility? Yes No				
				4) The quantity of each hazardous waste at each location within the facility? Yes No		<u>.</u>		
				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A				NOT A DISPUSAL FACILI

y y	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent diance? No	Not Applicable	Remarks or Comment No
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes			THESE METHODS NOT EMPLOYED BY FRICILITY

Area	9	F/U Req	Key Ltr Sub Sec		Requirement		parent bliance? No	Not Applicable	Remarks or Comment No
				9)	Records and results of inspections as required by Section 725.115(d)? Yes No				
					NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.				
				10)	Monitoring, testing or analytical data where required by Sections:	<u> </u>			
					- 725.190 (G.W. Monitoring)? Yes No N/A				THESE DATA NOT
					- 725.194 (G.W. Monitoring)? Yes No N/A				REQUIRED
					- 725.376 (Land Treatment)? Yes No N/A				
					- 725.378 (Land Treatment)? Yes No N/A				
 					- 735.380(d)(1) (Land Treatment)? Yes No N/A				
					- 725.447 (Incinerators)? Yes No N/A				
					- 725.477 (Thermal Treatment)? Yes No N/A				
					NOTE: Data required under 725.194 must be kept throughout the post-closure period.			<u>, </u>	•

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	2			11) All closure cost estimates required by Section 725.242? Yes V No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records	✓	÷		NOT A DISPOSAL FHEILITY
			С	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes No N/A - The local land authority? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A				NOT A DISPUSAL FACIL. NO UNRESOLVED ENFURCEMENT MICTION OR REQUESTS BY DIRECT

Area	Class	Day F/U	Key Ltr Sub	Requirement		parent bliance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	No	Not	
ОТН	2			Section 725.175: Annual Report	<u> </u>			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
ОТН	1			Section 725.176: Unmanifested Waste Report	V			
				Does the facility accept hazardous waste from off-site? Yes No	ŀ			
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
			,	Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No				·
	;			Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No				

Aree	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	2		a	Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No Section 725.177: Additional Reports Has the owner or operator submitted to the Agency, as required, reports concerning: 1) Releases, fires, explosions as specified in Section 725.156? Yes No N/A	V	No	N	
			b c	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes No N/A 3) Facility closure as specified in Section 725.215? Yes No N/A				

Area	Class	Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?		Remarks or Comment No
			350	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements			Z	
CLO	1			Section 725.212: Closure Plan	V			
			a	Was the most current facility closure plan available during the inspection? Yes No				·
				Was the closure plan submitted to the Agency within				FACILITY IS NOT GOLNO
				the time frames specified below:				THROUGH CLOSULE
				 At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes No N/A 				
				At least 180 days prior to the date of final closure of a facility with surface impound- ment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A				<i>, , , , , , , , , ,</i>
				 At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A 				
				 At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A 				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				 No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes				
CLO	1		a	Yes No N/A Section 725.218: Post-Closure Plan Was the most current facility post-closure plan available during the inspection? Yes No Was the post-closure plan submitted to the Agency within the time frames established in this sub-section?			>	NOT REQUIRED
FIN	1			Yes No N/A Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	~			V
FIN	1			Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? MOTE: If no post-closure plan, mark "N/A".			~	NOT REWUIKED

ş	• • • • • • • • • • • • • • • • • • •	Day	Key	Requirement		parent	Applicable	Remarks or Comment No
∢	Ö	F/U Req	Sub Sec		Yeş	No	Not A	, and the second
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
ОТН	1	х		Section 725.271: Condition of Containers	V			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
ОТН	1	X		Section 725.272: Compatibility of Waste with Containers	V			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
ОТН	1	X		Section 725.273: Management of Containers	V			
			a	Are containers of hazardous waste always closed during storage? Yes No				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				
ОТН	2			Section 725.274: Inspections	V			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes V No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
ОТН	1	х		Section 725.276: Special Requirements for Ignitable or Reactive Wastes	\ <u>\</u>	1		
				Are containers holding ignitable or reactive waste located at least 50 feet from the property line?				
ОТН	1	Х		Section 725.277: Special Requirements for Incompatible Wastes	V			
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				
				·				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems				
				Section 725.290: Applicability				
				Does the facility store or treat hazardous waste in tanks? Yes No				
				If "No", skip Subpart J.				
				NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.				
				Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No				LIQUID WASTE STUREL. IN TANK FARM CUTSIDE
				NOTE: Failing the filter test means that the waste contains free liquids.				
ОТН	2			Section 725.291: Assessment of Existing Tank Systems	<u> </u>			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No				
	:	:		NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				
						ł	l	

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	lot Applicable	Remarks or Comment No
ALLO	Cless	Day F/U	Ltr	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment;			Not Applicable	NO NEW TANKS
				NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave. 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes No				

Area	Cless	Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No				
отн				Section 725.293: Containment and Detection of Releases	V		-	
			aî	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes No N/A				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				
			a 3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				AGE OF TANKS IS UNKNOWN -
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A				SECONDARY CONTITIONED. IS ANTICIPATED BY 1995
				or If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A				

Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent diance?	Not Applicable	Remarks or Comment No
			ь1&2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A			·
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).			
			c4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A			
				NOTE: A RCRA permit may allow for removal of liquids Tass frequently than 24 hours after accumulation.			
			d	Does the secondary containment have one or more of the following:			
				 a liner (external to the tank); or 			
			<u>.</u>	2) a vault; or			
				 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes No N/A 			
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.			
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:			

1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes \sum No	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance?	Not Applicable	Remarks or Comment No
are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A i Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A 3) Are written records maintained at the facility to document the assessments required under Subsections (1)(1) and (2)?		4			joints, valves and connections) that are in-	} }			
inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes \(\subseteq \) No \(\text{NO} \) N/A \(Interval of the pipe o									·
automatic shut-off devices that are inspected daily? Yes \(\subseteq \ No \) N/A i Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes \(No \) N/A 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes \(No \) N/A \(\subseteq \) 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)?						 			
are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)?					automatic shut-off devices that are inspected daily?				
yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A				i	are the following requirements being met for all tank				NO UNDERGRUNDS TAN
equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)?					yearly leak test that meets the requirements of 725.291(b) been conducted?				
to document the assessments required under Subsections (i)(1) and (2)?					equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted?				
					to document the assessments required under Subsections (i)(1) and (2)?				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		Appare nplianc		Remarks or Comment No
ОТН	1	X	b1&2	Section 725.294: General Operating Requirements Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill	V	1		MANUAL INSPECTIONS DURING FILLING
				prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes No				
			ь3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A				NO UNCOVERED TANKS
			С	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A				NO LEARS OR SPILLS
отн	2			Section 725.295: Inspections	L	4		
			С	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspections as required in 725.295, Subsections (a) and (b)? Yes No				
ОТН	1	х		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems		-	-	NO LEAKS UR SPILLS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No				
	,			MOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

Ares	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Remarks or Comment No
			·	If a tank or secondary containment system has leaked, has the owner done the following:		
			a	1) Ceased using, stopped inflow of wastes? Yes No		
			b	Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes No		
		-		3) Taken actions to prevent waste migration and removed and properly disposed of visibly con- taminated soil or subsurface water? Yes No		
			d	4) Reported to the Agency within 24 hours of detection? Yes No		
				NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.		
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No		
			е4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No N/A		
			_	NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.		

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after returning the tank system to use?			
CLO	1		; ;	Yes No N/A Section 725.297: Closure and Post Closure Care		V	FACILITY NOT GEING
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.			THROUGH CLOSURE
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No			
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes No			
			b	If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No			
				MOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.			

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes	V			
				Are ignitable or reactive wastes stored in tanks? Yes No NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes \(\sum_{\text{NO}} \) No \(\sum_{\text{NO}} \)				·
				<u>NOTE</u> : Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.				
	-		b	Are there proper protective distances between the waste management area and the facility boundary line? Yes No				
ОТН	1			Section 725.299: Special Requirements for Incompatible Wastes			V	IN COMPAN BLES THE NOT STORED IN THE LINE TO
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
ОТН	1		a	Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner: 1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A or 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.			TANKS NOT USED TO STORE SIGNIFICANTLY DIFFERENT WASTES

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

r General Priotante					
Facility:		LERITAGE	ENVIRON	MENTAL	SERVICES
U.S. EPA ID No.:		120085	349264	031/62	0007.
Street:		ANAL BA	VK ROAD	NE	
City:	_ <i></i>	EMONT	Si	use <u>/L</u> Zi	p: 60439
Telephone:		7087	39 1151		
Inspection Date:	32	<u>9</u> 92 Time	= <u>930A-13</u>	OPM (ARPR)	
Weather Conditions:	 -	2005			
	Nam	.	Agency/Tit	le <u>Tel</u> e	ephone
Inspectors:	JA	MES HAEN			202531590
			· · · · · · · · · · · · · · · · · · ·		·· ·· ·· ·· ·· ·· ·· ·· ·· ·· ·· ·· ··
Facility Representation	ves: <u>bo</u>	B GARGIA	PLANTM	GR 708	739 1151
					
See Appendix B to de	termine which	of the followin	g LDR waste c	ategories the fa	cility manages:
	Generate	Transport	Ireat	Store	Dispose
F001-F005 Solvents			_		
F020-F023 and F026-F028				· 	
California List	V			<u> </u>	
First Third [40 CFR 268.10]	<u>~</u>			<u> </u>	
Second Third) CFR 268.11]		$\sqrt{}$	V		
ird Third [40 CFR 268.12]			<u></u>		

^{*} See Apparable A

GENTSD/TRANS

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- FUEL BLENDING OF HAZ WASTE W/ MASTE OILS
- RE-PACKALING OR RE-MANITESTING HAZ WASTES
 ACCEPTED I=ROM OFF SITE GENERATORS

LDR Waste Management:

ALL LOR WASTES SHIPTED OFF-SITE FOR

Summary:

NO LOR VIOLATIONS

Signature James Haunil

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

TUAC	AL INE	NATE OF	TTON	

A.	List ·	waste codes which the facility handles in each of the following LDR categories*:
	1.	FOOI THROUGH FOOS SPENT SOLVENTS
	2	F020-F023 and F026-F028 dioxin-containing wastes:
	3.	California List Wastes (See Appendix A): VARIOUS WASTE CODES POSSIBLE
	4.	First Third Wastes [40 CFR 268.10]: VARIOUS WASTE CODES POSSIBLE
	5.	Second Third Wastes [40 CFR 268.11]: VARIOUS WASTE CODES POSSIBLE
	6.	Third Third Wastes [40 CFR 268.12]**: VARIOUS WASTE CODES POSSIBLE
B.	chara	oxicity characteristic (TC). Small quantity generators must comply with this new requirement /29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" at they will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, if they are characteristic for a constituent previously covered under the EP toxicity exeristic (SS FR 22531).
.	1.	Have all wastes been correctly identified for purposes of compliance with
		40 CFR Part 268?*
		Yes_V No
		If no, list below:
		Assigned Classification Correct Classification
		Areas of concern include: California List/weste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and V waste codes/F and K wastes; and waste code carry through principle.
		Comments:

	2			haracteristic waste code been assigned, where a listed waste to CFR 268.9(a)]
		Yes 🗸	No	NA
		Comments_		
	3.	Has multi-so	ource leachate l	been assigned the F039 waste code?" [40 CFR 261.31]
		Yes	No	NA V
		*leachate der Individual ma	ived exclusively ste codes.	from F020-F023 and/or F026-F028 dioxin wastes retains the
		If yes, was si 22623]	: ngle-source lea	achate combined to form multi-source leachate? [55 FR
		Yes	No	•
		Comments_		
2	Does :	the facility has	ndle the follow	ing wastes (national capacity variances)?
	1.			oil and debris resulting from a CERCLA response action on (expires - 11/08/90). [40 CFR 268.30(c)]
		Y¤	No V	List
	2.			nd debris resulting from a CERCLA response action or a expires - 11/08/90). [40 CFR 268.31(b)]
		Yes	No	List
	3.			d soil and debris resulting from a CERCLA response we action (expires - 11/08/90). [40 CFR 268.32(d)(2)]
		Yes	No 🔽	List
	4.	K048-K052 j	petroleum wast	tes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35
		Yes	No	List
	5.	incineration K014, K023, K113, K114, P094, P097,	set in the Seco K027, K028, K K115, K116, P P109, P111, U0	ed with wastes that had treatment standards based on and Third rule - F010, F024, K009, K010, K011, K013, K029, K038, K039, K040, K043, K093, K094, K095, K096, P039, P040, P041, P043, P044, P062, P071, P085, P089, D28, U058, U069, U087, U088, U102, U107, U190, U221, 8/91). [40 CFR 268.34(d)]
		Yes	No 🗸	List

Note: Inco RCRA haz (expires - 0) Yes Wastes liste	ardous wastes th 5/08/92). [40 CF No V	ist contain naturally occurring radioactive materials R 268.35(c)] List B.10, 268.11, and 268.12 that are mixed ex (expires - 05/08/92). [40 CFR 268.35(d)]
*Note: Inco RCRA haz (expires - 0.	ardous wastes th 5/08/92). [40 CF	at contain naturally occurring radioactive materials R 268.35(c)]
*Note: Inco RCRA haz (expires - 0.	ardous wastes th 5/08/92). [40 CF	at contain naturally occurring radioactive materials R 268.35(c)]
_	rrect reference (4	40 CFR 268.2(a)(7)] in Third Third rule.
I &		
V.,	No V	List
Inorganic se	olid debris as dei ring EPA Hazard	fined in 40 CFR 268.2(g)*; includes chromium refactor dous Waste Nos. K048-K052 (expires - 05/08/92). [40
Yස	No V	List
(nonwaster	vaters), D008 (le	fied as hazardous based on a characteristic alone: D00 and materials stored before secondary smelting), D009 05/08/92). [40 CFR 268.35(c)]
Yes	No <u></u>	List
		ters - F039, K031, K084, K101, K102, K106, P010, P01; 87, P092, U136, U151. (expires -05/08/92). [40 CFR
Yes	No V	List

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IIL GENERATOR REQUIREMENTS

A.	Trent	ability Group/Tre	stment Standard Identif	ication*
		This information ther documentation si		OR notifications. If not, waste profile data
	1.			he generator correctly determine the standard for each F-solvent?
		Yes 🗸	No NA	
		If available, list	each waste code and chec	k the correct treatability group.
		Waste Code F00 I	Wastewater*	Nonwastewater
		F005		
		*Less than 1% by FOC5 solvent cons	weight total organic carbon tituents listed in 40 CFR 2	(TDC), or less than 1% by weight total F001- 68.41, Table CCME. [40 CFR 268.2(f)(1)]
		Comments		
	2.			: Does the generator correctly determine ent standard for each dioxin waste?
		Yes	No_ NA_	
		If yes, list each w	vaste code and check the	correct treatability group.
		Waste Code	Wastewater*	Nonwastewater
		Comments		
		*Less than 1% 700 [40 CFR 268.2(f)]	by weight and less than 12	total suspended selids (TSS) by weight.
	3.	First, Second, as	ed Third Third Wastes:	
			e generator correctly dete eatment standard for each	ermine the appropriate treatability haste?
		V 1/	· No · N	A

	If available, in	st each waste co	ode and check th	e correct treatability group:
	Waste Code	Subcategory	Wastewater*	Nonwastewater
	VARIOUS			$\overline{}$
	* Less than 1% (TRS) with the 5% by weight To than 4% by weigh	TOC by weight an following except XC and less than ght TOC and less	d less then 1% to ions: K011, K013, 1% by weight TSS; than 1% by weight	tel suspended solids and K014 westewaters - less than K103 and K104 westewaters - less TSS. [40 CFR 268.2(f)(2) and (3)]
	Comments			
b.				d wastes cover constituents that stics? [40 CFR 268.9 (b)]
	Yes <u>V</u>	No	NA	
c.	Does the gene	erator specify al	ternative treatm	ent standards for lab packs?*
	Yes	No V	NA	
	*Use of the alt	ernative treatme	nt standards is n	ot required. [55 FR 22629]
	If yes, do lab ;	packs only conta	in the following	wastes?* [40 CFR 268.42(c)(2)]
			1 268, Appendix 268, Appendix V	IV constituents constituents
	*Unregulated wa commingled in t	istes and hazardo the appropriate A	us wastes which m ppendix IV and V	eet treatment standards may be lab pack. [55 fR 22629]
d.	Does the gene source leacha		ternative treatm	ent standards for F039 multi-
	Yes	No	NA 🗹	
	*Use of the alt	ernative treatmen	nt standards is re	iquired. (55 FR 22619)
Califorand to	ornia List Waster reatment standar	n: Has the gener rd/prohibition k	rator correctly id evel for the follo	lentified the treatability group wing wastes? [55 FR 22675]
2.	Liquid bazard	ous wastes cont	taining PCBs ≥5	O ppm
	Yes	No	NA 🗹	
	If yes, check t	be appropriate	treatability grou	p:
	50 to 500	ppm PCBs		

	ь.		uids) HOCs, whi			
		Yes <u>V</u>	No	NA		
		If yes, cl	beck the appropr	iate treatability	group:	
		V All	ute HOC wastewn other HOCs grea (liquids) or mg/l	iter than or equi		HOCs) ition level of 1,000
	C.		nazardous wastes ng/l nickel and/or			l also contain
		Yes	No	NA V		
5.						nia List prohibitions nces? (See Appendix
	Yes_	_	No	NA_	,	
	the wa	ಟೀ ದಾರವ .		or identified all a	applicable treat	ly applies to some of ment standards and
	Yes_	_	No	NA 📈		** **
	comp	ete the fo	t prohibitions applications to the library to the l	each waste code	ims managed by noting the da	y the generator, te on which relevant
	Waste	Code	Cal List A	Applicability	Expiration D	ate
			·····	···-		-
	Come		•	· 	''-	-
6.	•					
u.	an alt	ment stand ernative m	ethod to that req	vired in 40 CFF	1010gles: 1145 to 1 268.42?	e generator specified
	Yes_		No <u>√</u> N	A		
			aste code, the tec cumentation of a			58.42, the alternative
	Wa	ste Code	Required Techno	ology Alternativ	ve Method	Approval
	_	 .				

	7.	Does the ger constituent of		wastes with different treatment stand	dards for a
		Yes 🗹	No		
			e generator select the 3.41(b) and 268.43(b)]	most stringent treatment standards?	
		Yes 🗹	No		
		Comments	RESTRICTED L	JASTES ARE MIXED VIA	FUEL BLOUDING
B.	Waste	Analysis			
	1.	Does the gen standards/pro	nerator determine who ohibition levels at the	ether restricted wastes exceed treatm point of generation?* [268.7(a)]	ient
		Yes <u>√</u>	No		
		*Note: This d prohibition le		de at the point of disposal if the waste	e only has a
		If no, does th standards?	ne generator ship all r	estricted wastes as not meeting treatr	nent
		Yes	No		
		Comments			
	2.	Which of the	following analytical	methods does the generator employ?	•
		a violation.		questions b. through d. does not necessa moste is rarely adequate if a generator n mat.	
		a. Know	wledge of waste:		
		Yes_	<u>✓</u> No		
		If yes the be Au	s, list the wastes for whasis of determination 1 NCOMING WA	hich applied knowledge was used and Attach documentation. [40 CFR 26 STES - LISTED WASTES * F DED BY GEVERATORS	68.7(a)(5)]
		b. TCLI analy	P°: Are wastes with to	reatment standards specified in 40 CI BDAT*** = stabilization/immobiliza	FR 268.41 Ition
		Yes		NA	
		EPA T	Test Hethod 1311)	tic Leaching Procedure (40 CFR Part 268, ons. Desirable technology. See Appendix A.	, Appendix 1,

		If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)] HAZARDOUS WASTE FUEL
		LAST TCLP TEST: 2-11-92
	c.	Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)
		Yes_ No_ NA_
		*See Appendix C for exceptions.
		If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]
	ď	PFLT*: Was PFLT used to determine if California List constituents were contained in <i>liquid</i> bazardous waste?
		Yes No NA
		*PFLT = Paint filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]
		If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]
3.		the generator treat restricted wastes in 90-day tanks or containers regulated 40 CFR 262.34 (permissible in some states)?
	Yes_	No (If No, go to 4.)
		the generator treat the wastes to meet appropriate treatment ards/prohibition levels?
	Ycs_	No
	If yes, testing	has the generator prepared a waste analysis plan detailing the frequency of to be conducted? 40 CFR 268.7(a)(4)]
	Yes_	No (If No, go to 4.)
	Does	the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]
	c	ased on a detailed chemical and physical analysis of a representative sample ontains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Ya.	No
Com	ments
Dilut	ion Prohibition [40 CFR 268.3]:
2.	Does the generator mix prohibited wastes with different treatment standards?
	"See Appendix E for distinction between restricted and prohibited westes.
	Yes No (If No, go to b.) Fooi-Foos, et
	List the wastes LISTED WASTES IN FUEL BLENDING
	Are the wastes amenable to the same type of treatment? [55 FR 22666]
	Yes No
	Comments INCINERATION; FUEL BLEWING
b.	Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardots? [55 FR 22665-22666]
	Yes No (If No, go to c.)
	Check appropriate category:
	Dilutes to meet treatment standards Dilutes to render waste non-hazardous
	Do the wastes fall into the following categories? (Check if appropriate.) [46 CFR 268.3(b)]
	Managed in treatment systems regulated under the Clean Water Act Non-toxic* characteristic wastes
	Treatment standard specified in 40 CFR 268.41 or 268.43
	"Men-texic = 9001(except high TGC nonvectowaters), 9002, and 9003(except dyanides and sulfides). [55 FR 22666).
	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
C.	Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]
	Yes No <u></u>
	Comments

	5.	F039 N constit	fulti-source le uents of conce	achate: Has t em in 40 CFR	he genera 268.41 a	itor run a nd 268.4.	nn initial a 3? (55 FF	analysis for R 22620]	r all	
		Y¤_	_ No _	NA	<u>\</u>					
2	Mana	agement								
	1.	On-Sit	e Managemen	t						
		2.	Are restricted greater than	d wastes treat 90 (small qua	ed (other nuty gene	than in a	RCRA (180) days	exempt un , or dispos	it), stored fo ed on site?	or
			Yes 🗸 🖰	No						
			(If yes, the T	SD Checklist	must als	be com	pleted.)	•		
			* Small quanti less than 1,00 waste	ty generator = 0 kg/mo. hazar	generator Sous waste	of great(, or less	r than or than 1 kg/	equal to 1: /mo. acute:	00 kg/mo. but y hazardous	t
			Comments_	FACILITY	HAS IN	JTERIN	N STAT	us for	TREATM	EUT, STORAGE
		b.	Clean Water restriction, he pursuant to a 22662]	tor treats chan Act, have the ow restricted in NPDES pe	following wastes are mit are n	g been de manage ot probi	ocumente ed, and wi	d: the det by wastes o	ermination lischarged	of
			Yes	No	NA.	\checkmark				
		C.		tor treats cha zardous, are t it standards ar	be wastes	manage	d as restri	cted until		
			Yes	No	NA.	\checkmark				
			This applies 268.41 and 268 treatment belo	to both cencen 1.43, and to sa w the characte	tration be me 40 CFR ristic lev	sed treats 268.42 rec et. See /	ment stands quired mets Appendix D	ards specif hods which	ied in 40 CFI result in	1
	2	Off-Sit	e Managemen	it: Waste Exc	eeds Trea	tment St	andards			
		•	/prohibition l	erator ship as evels (not sub storage facili	oject to a					•
			Yes 🗸	No	(II)	io, go to	3.)			
			Identify wast wastes are sh	e code(s) and ipped.	off-site t	reatment	or storag	ge facilities	to which	
			Waste Code VAR10US	TWI- ROLLA OHM	INDUAN SAUGE	APOLIS T, ILL. USIAN	_			

Yes No (If No, go to 3.) If the generator specifies alternative treatment standards for lab	
If the generator specifies alternative treatment standards for lab	
certification required in 40 CFR 268.7(a)(7) or (8) included with notification?	packs, is the the
Ys No NA V	
b. Is a notification sent with each waste shipment?	
Yes V No	
If no, is the waste subject to a tolling agreement pursuant to 262.2 quantity generator only)?	20(e) (small
Yes No (If No, go to 3.)	
List waste codes and subsequent handler with whom a contractua tolling agreement is held.	ıl
Waste Code Subsequent Handler	
Did the small quantity generator provide a notification to the rec facility with the first waste shipment subject to the tolling agreem CFR 268.7(a)(9)]	
Yes No	••
3. Off-Site Management: Waste Meets Treatment Standards	
a. Does the generator ship waste that meets treatment standards/pr levels to an off-site disposal facility?	ohibition
Yes No (II No, go to 4.)	
Identify waste code(s) and off-site disposal facilities:	
Waste Code Receiving Facility	
	- -
Does the generator provide a notification and a certification to the facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?	he disposal

	b.	Are a notifica	tion and	a certification sent with each waste shipment?
		Yes	No	•
		If no, is the w quantity gene		ect to a tolling agreement pursuant to 262.20(e) (small y)?
		Yes	No	(If No, go to c.)
		List waste coo tolling agreen		ibsequent handler with whom a contractual
		Waste Code		Subsequent Handler
		····		_
			facility wi	generator provide a notification and a certification to the the trial waste shipment subject to the toiling 68.7(a)(9)]
		Yes	No	
	C.			es which have been rendered non-hazardous (in a ipped to a Subtitle D facility?
		Yes	No	NA (If No or NA, go to 4.)
		Complete the	following	g table:
		Waste Code		Receiving Facility
		Are a notifica Administrator	tion and a or autho	rized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?
		Yes	No	
4.		Off-Site Mana	gement:	Wastes Subject to Variances, Extensions, or Petitions
	2.	which are sub	ect to a n	p wastes to a treatment, storage, or disposal facility national capacity variance (40 CFR Part 268, Subpart ension (40 CFR 268.5)?
		Yes	No	(II No, go to 5.)
		Complete the	following	table:
		Waste Code		Receiving Facility

		the wa	rie gener	prohibi:	ied from	land dispos	al? [40 CF	R 268.7(a)(3)]
		Yes_		No					
	b.	Is a no	tilication	sent wit	th each v	waste shipme	ent?		
		Y¤_		No					
				•		olling agreen	ent pursu	ant to 40 CI	FR
		Yes_	- , 1	No	((If No, go to	5.)		
			aste codes agreemen			t handler wit	th whom a	contractual	
		Waste	Code	<u>Ş</u> ı	ubseque	nt Handler			
			- -						
		facility		first was		r provide a n nent subject			
		Yes_		No					
5.	Recor	ds Reter	ntion						
						s of all notifi ars? [40 CFF			and other
	Yes_\		No						
	certific	ation, k		e for at 68.9]	least 3 y	nts, along wi ears after ex			
	Yes_	-	No	1	NA_✓				
	Do LI expire provisi	d nation	ments ref al capacit	Dect pro y varian	per man ces, case	agement of by case exte	wastes pre ensions and	viously cove i the soft ha	red under Immer
	Yes _	_	No	1	NA_	•			
	westes	which has	d treatment	t Stander	de estab	r provision ex lished in the to 08/08/90.	pired as ef Third Third	05/08/90. S rule were 9	oft hammer ranted a
	Comm	ents							

Tre	atment Using RC	RA 40 CFR	Parts 264 and 26	5 Exempt Units or Processes
1.	Are restricted distillation un	i wastes trea pits, wastewa	nted in RCRA exe nter treatment tani	mpt units (i.e., boilers, furnaces, ks, elementary neutralization, etc.)?
	Yස	No <u>V</u>	(If No, do n	ot complete this section.)
	List types of	waste treatm	ent units and prod	ක ස :
	Waste Code	Typ	e of Treatment	Treatment Units and Processes
	 			
2		_	enerated from the	se units?
	Yes	No		
	Comments _			
3.	Are residuals	further trea	ited, stored for gre	eater than 90/180 days, or disposed on site
	Yes	No	NA	
	Of yes the T	SD checklis	t must also be con	related \
_				
_				
_				
_				
_				
_				
				
_			· · · · · · · · · · · · · · · · · · ·	
_				

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

Does the trans 268.50(a)(3)]	sporter accumulate re	stricted wastes for more than 10 days? [40 CFR	1
Yes <u>√</u>	No		
If yes, check the	de appropriate regulat	ory status:	
Interim s	tatus for storage ermit for storage		
(The TSD che	cklist must also be co	mpleted.)	
If no, describe	inventory controls to	ensure that wastes are not stored for more than 1	0 days:
	sporter mix or combin [40 CFR 263.10(c)(2)	ne restricted wastes of different DOT shipping)]?	
Yes <u>√</u>	No		
(If yes, the Ge	nerator checklist mus	talso be completed.) DOT SHIPPING DESCRIPTIONS	000
		LENDING PROCESS	mce
	eatment tanks, elemen	RA exempt units (boilers, furnaces, distillation in tary neutralization, etc.)? o, do not complete this section.)	
List types of w	aste treatment units a	nd processes:	
Waste Code	Type of Treatment	Treatment Units or Process	
Are treatment	residuals generated fi	rom these units?	
Yes	_		
Comments_			,
Are residuals	further treated, stored	for greater than 10 days, or disposed on site?	DC0=
Yes	No NA		RECEI
(If Yes, the T	SD checklist must also	be completed.)	-8 APR
- *		•	IEPA/D

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A.	Wast	te Analysis [40 CFR 268.7(b), 264.13, and 26	5.13]		
	1.	Does the waste analysis plan address the for [40 CFR 264.13(b)(6) and 265.13(b)(6)]	ollowing LDR w	aste categories	?
		F001-F005 Spent Solvents	Yes <u>√</u>	No	NA
		F020-F023 and F026-F028 Dioxins	Yes	No	NA <u>✓</u>
	•	California List Wastes	Yes <u>√</u>	No	NA
		First, Second, and Third Third Wastes	Yes <u>√</u> Yes <u>√</u>	No	NA
		Comments			
	2.	Has the waste analysis plan been revised to	address F039 n	nulti-source lea	chate?
		Yes_ No_ NA_			
	3.	What date was the waste analysis plan last	revised? <u>2/</u>	191	
	4.	Does analytical data contain all the inform restricted wastes? [40 CFR 264.13(a)(1) a			r dispose of
		Yes V No_			
		If yes, which of the following are sources of apply.):	of analytical data	? (More than o	ne may
		Generator provides data Facility performs analyses in on-site la Facility contracts analyses at off-site la	boratory Q4/G	c	
		If the generator provides data, does the fa CFR 264.13(a)(2) and 265.13(a)(2)]	cility provide co	rroborative test	ing? [40
		Yest No NA NA			
		If analyses are conducted off site, identify	lab: EHS LA	BS -Rome	viue, ILL.
		a. Are wastes with treatment standar using the toxicity characteristic leastabilization/immobilization technology.	ds specified in 4 ching procedure	0 CFR 268.41 a (TCLP)?* (B	nalyzed
		Yes No V	\ <u> </u>		
		*See Appendix C for exceptions. **SDAT * best demonstrated available	technology. See	Appendix A.	

	test fredact		nd note any problems. Attach test results. [40 .73(b)(3)]
b.	Are wastes to using total co	onstituent analy	standards specified in 40 CFR 268.43 analyzed ysis? (BDAT = destruction/removal technology)
	Yes	No <u></u>	NA
	*See Appendix	C for exceptions	s.
	the date of l	ast test, frequer	ich total constituent analysis was used and providency of testing, and note any problems. Attach test (3) and 265.73(b)(3)]
C.			t (PFLT) used to determine if California List uid hazardous waste? [40 CFR 268.32(i)]
	Yes	No <u>V</u>	NA
	test, the freq		ich PELT was used and provide the date of last g, and note any problems. Attach test results. [4073(b)(3)]
B. Operating Re	cord [40 CFR	264.73 and 26	5.73]
specifi			records and results of waste analyses performed as CFR 268.7(b)? [40 CFR 264.73(b)(3) and
Yes_	✓ No_		
			copies of LDR notifications and certifications?* 15) and 40 CFR 265.73(b)(11), (13), and (15)]
Yes	✓ No_		
*Includ	se both those re	ceived from gene	rators, and those prepared for off-site shipments.
which		wholly on site?	appropriate documentation for restricted wastes: [40 CFR 264.73(b)(12), (14), and (16) and
Yes <u>\</u>	✓ No_	_ NA	·

	managemen	t of wastes prev	iscussed in points 2. and 3. reflect proper historical viously covered under expired national capacity variances, d the soft hammer provision?
	Ys	No	NA <u>V</u>
	"Note that th trestment sta hational capa	e soft hammer pri ndards establish city variance to	ovision expired as of 05/08/90. Soft hammer wastes which had ed in the Third Third rule were granted a minimum 90-day 08/08/90.
Store	ge [40 CFR 26	8.50]	
1.	=		red on site in containers?
	Yes 🗸	No	(If No, go to 2)
	*See Appendix	E for distinction	on between restricted and prohibited westes.
		ainers clearly m CFR 268.50(a)	parked to identify the contents and date(s) entering (2)(i)]
	Yes 🗸	No	
		been stored fowent into effect	or more than one year since the applicable LDR
	Yes	No 🗸	(If No, go to 2.)
			uch accumulation is necessary to facilitate property ocsal? [40 CFR 268.50 (c)]
	Y¤	No	_
	If yes, state	how:	
2.	Are prohibit	ed wastes store	ed on site in tanks?
	Yes 🗹	No	(If No, go to 3.)
	hazardous w	raste received, a recorded and m	d with a description of the contents, the quantity of each and date each period of accumulation begins, or is such naintained in the operating record? [40 CFR
	Yes 🗸	No	
	Have tanks went into ef		at least once per year since the applicable LDR regulations
	Yes <u>V</u>	No	(If Yes, go to 3.)

C.

					FR 268.50(c)]	a. proper
		Y¤	No		•	
		If yes, state ho	ow:			
	3.		lity store liquior equal to 50		s waste containing PCBs at	concentrations
		Y¤	No <u>V</u>	(If No,	go to D.)	
		Does the facil	lity meet the T	TSCA criter	ia in 40 CFR 761.65(b)? [40 CFR 268.50(f)]
		Yes	Ño			
		Have these wa	asies been sto	red for mor	e than one year? [40 CFR	268.50(1)]
		Yes	No			
D.	Treat	iment				
	1.	Does the facil	ity treat restri	icted wastes	other than in surface imp	oundments?
		Yes 🗹	No	(If No,	do not complete this section	on. Go to E.)
	2.		technologies CFR 268.42		t wastes which have treatm 268.40(b)]	nent standards
		Yes	No_√	NA	(If Yes or NA, go	to 3.)
		Was an altern	ative method	approved?		
		Yes_V	No	FUEL	BLENDING	
					pecified in 40 CFR 268.42, native method is documen	
•		Waste Code	Required T	echnology	Alternative Method	Approval
	_					
	3.	from lab pack	s containing I with the subj	2004, D005	indards are specified, are in , D006, D007, D008, D010 ment standards for these o), and D011 treated
		Yes	No	NA_V		•

Describe all other waste codes and treatment processes:						
	e Code HOUS CHI SEP FU	Treatment EMICAL & P ARATION FE EC BLEN	Processes PHYSICAL DLLAWED BY DING			
Char	acteristic waste	: :				
	e 40 CFR Part 2 acteristic level?		standard lower than the 40 CFR Part 261			
Yes	No _	_				
end 26	applies to both 58.43, and to some cteristic level.	w 40 CFR Z68.4Z	based treatment standards specified in 40 CFR 268.41 2 required methods which result in treatment below the 0.			
treati	, does the facili ment standards 268.9(d)]	ry manage the are met, even	e waste as restricted until 40 CFR Part 268 after the waste is rendered non-hazardous? [40]			
Yes_	No_	_				
Com	ments					
Dilut	ion Prohibition	[40 CFR 268.	.3]:			
a .	Does the fac	ility mix prohil	ibited wastes with different treatment standards?			
	Yes 🗸	No	(If No, go to c.)			
	List the wast	स । । ।	SOLVENTS + DOOM WASTES (FUE RLENDING)			
ъ.	Are the wast	ස amenable to	to the same type of treatment? [55 FR 22666]			
	Yes 🗹	No				
	If yes, is this	method used i	for the aggregated wastes?			
	Yes	No				
	Comments_	·				
C.			f points a. and b., or any other relevant information, tute for treatment? [40 CFR 268.3(a)]			
	Yes	No V				
	Comments_					

		i? [40 CFR 268.7(b)]	e waste analysis plan, test resid
Yes 🗹	No		
Comments			
	lity ship any ch a Subtitle D fa		ch have been rendered non-
Yes	No <u>✓</u>	(If No, go to 9.)
Complete the	following tabl	e:	
Waste Code	Rece	iving Farlity	
			ment sent to the Regional 9(d)(1) and 268.7(b)(5)]
Yes	No		
Does the facil facility?	ity ship any wa	stes or treatment resid	dues to an off-site land dispos
Yes	No <u>√</u>	(If No, go to 10.)	ONLY NON-HAZARDO
Complete the	following tabl	е:	TANK BOTTOMS
Waste Code	Rece	iving Facility	
			ta ta da di manalifa all'impanish a
waste shipmen	non and a cert nt? [40 CFR 2	itication provided to the 68.7(b)(4) and 40 CFI	he land disposal facility with 6 R 268.7(b)(5)]
Yes	No		b
	lity ship any we Iment or stora		lues to be further managed at
Yes 🗸	No	(If No, go to E)	

		Complete the	toffoming raph	ie:	
		Waste Code	Recei	iving Facility	
		VARIOUS	OHM -	GEORGIA GEORGIA - LOUISIANA	
		Are appropria	ite generator n ich waste shipr	notifications and certifications provided to the receiment? [40 CFR 268.7(b)(6)]	iving
		Yes <u>v</u>	No		
E.	Surfa	ce Impoundmen	ts (40 CFR 20	268.4]	
	1.	Are restricted	wastes placed	in surface impoundments for treatment?	
		Yes	No <u>✓</u>	(If No, go to F.)	
		List			
	2.			the only recognizable treatment occurring in the su (8.3(a) and 268.4(b)]	ırface
		Yes	No		
		Comments _			
	3.	compliance w		o the Agency a waste analysis plan and certification technology requirements and ground-water monitor 8.4(a)(4)]	
		Yes	No		
	4.			requirements have not been met, has a waiver been CFR 268.4(a)(3)(ii)]	3
		Yes	No	NA	
	5.	tested separat	tely, acceptably ified in the was	of sludge and supernatant from the surface impour y, and in accordance with the sampling frequency as ste analysis plan? (Attach test results.) [40 CFR	edment nd
		Yes	No	·	
	6.	Does the oper performed in 265.73(b)(3)]	accordance wi	adequately document the results of waste analyses ith 40 CFR 268.4? [40 CFR 264.73(b)(3) and	
		Yes	No		
		Comments		•	

	7.	Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?						
		Sludge Supernatant	Ys	No _	Waste Code	_		
		Provide the fr	equency of a	nalyses conduct	ed on treatment residues:			
	8.			eatment stands 268.4(a)(2)(ii)]	rds/prohibition levels, are the	y removed on		
		Yes	No	NA		•		
								
		Are residues s 268.4(a)(2)(iii		managed in and	other surface impoundment?	40 CFR		
		Y¤	No					
	9.	If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]						
		Yes	No	NA				
		Comments_				م الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد الساد		
F.	Land	Disposal						
	1.	Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]						
		Yes	No <u></u>	(If No, go	o G.)			
		*Wate: Do not	include surfac	e (spoundsents e	tiressed in E.			
		If yes, specify which units and what wastes each unit has received:						
		Unit		W	sie.			
						·		
	2	wastes prior to	Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]					
		Yes	No			_		
		Comments			·			

J.		the point of disposal?* [40 CFR 268.9(c)]							
	Yes	No	NA						
		este may exceed a t characteristic (characteristic level only if the treatment standard for has been set.						
4.	Does the operformed 265.73(b)(3	in accordance w	adequately document the results of waste analyses with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and						
	Y¤	No							
	If yes, at w	hat frequency as	re analyses performed?						
5.	Does the fa	acility land dispo	ose of restricted wastes which are not prohibited?						
	Y¤	No	(If No, go to 6.)						
	List waste	codes in approp	riate category below:						
	Case-By-C	ase Extension (4	e (40 CFR Part 268, Subpart C)						
	No-Migrati Treatment	ion Petition (40 Standard Varia	CFR 268.6) nce (40 CFR 268.44)						
	copy of the	generator notil	contain records of the quantities, date of placement, and a lication [40 CFR 268.7(a)(3)] for each shipment of a case-by case extension or no-migration petition? [40 5.73(b)(10)]						
	Yes	No	NA						
		Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?							
	Yes	No	NA						
	If the facili	ity has a case-by the Regional Ac	-case extension, is progress being made as described in iministrator?						
	Yes	No	NA						
6.	Are restric	ted wastes place	ed in underground injection wells?						
	Yes	No	List						

G.	Other	Wastestreams							
	1.	Does the facility generate wastes other than residues from RCRA treatment units?							
		Yes No (If No, go to H.)							
	2	On-Site Management							
		a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]							
		Yes No NA							
		b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]							
		Yes No NA							
		*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix 9.							
	3.	Off-Site Management: Waste Exceeds Treatment Standards							
		Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?							
		Yes No (If No, go to 4.)							
		Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.							
	•	Waste Code Receiving Facility							
		VARIOUS HES-INDIANAPOLIS, IND. TWI- SAUGET, IU. ROLLINS- LOUISIANA							
		Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]							
		Yes V No (If No, go to 4.)							

	required in 40 CFR 268.7(a)(7) or (8) included with the notification?					
	Y¤_	No_ NA_				
4.	Off-S	ite Management: Wastes Meets Treatment Standards				
	a.	Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?				
		Yes No (If No, go to 5.)				
		Identify waste code(s) and off-site disposal facilities:				
		Waste Code Receiving Facility				
	,					
		Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?				
		Yes No (If No, go to b.)				
	b.	Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?				
		Yes No NA (If No or NA, go to 5.)				
		Complete the following table:				
		Waste Code Receiving Facility				
		Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?				
•		Yes No				

N/A 5.	Off-S	ite Management: Wastes Sub	ject to Variances, Extensions, or Petitions				
	a.	Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?					
		Ys No	(If No, go to 6.)				
		Complete the following tab	ile:				
		Waste Code Rec	eiving Facility				
	b.		ting that the waste is not prohibited from land shipment to the off-site receiving facility? [40]				
		Ys No					
6.	Diluti	on Prohibition [40 CFR 268.3	3]:				
	a.	Are prohibited wastes with	n different treatment standards mixed?				
		*See Appendix E for distincti	on between restricted and prohibited wastes.				
		Y⇔ <u>√</u> No	(If No, go to b.)				
		List the wastes USTED So	OLVENTS + IGNITABLE WASTES				
		Are the wastes amenable to	the same type of treatment? [55 FR 22666]				
		Yes No					
		Comments INCINERATION	IN, FUEL BLENDING				
1	b.	Are prohibited wastes dilute them non-hazardous? [55]	ed to meet treatment standard criteria, or render FR 22665-22666)				
		Yes_ No	(If No, go to c.)				
		Check appropriate category	ŗ.				
		Dilutes to meet treatme					

Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "Non-texic = 0001 (except high 100 nonwastemeters), 0002, and 0003 (except e end outfides). 155 FR 22466) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant		Do vastes fall into the following categories? (Check it appropriate.) [4] CFR 268.3(b)]
Therefore = 0001 (except high 100 normasteweters), 0002, and 0003 (except early sulfides). 155 FR 22466) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments		
If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments		_ ·
c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments	,	end aulfides). [55 FR 22666]
c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments		
circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments		
Comments	c.	circumstances, are prohibited wastes diluted as a substitute for adequate
		Yes No <u></u>
ditional Comments, Concerns, or Issues Not Addressed in the Checklist:		C
	iditional (
	lditional (
	iditional (

Illinois Environmental Protection Agency Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA#: TE T					IEPA #:		<u> </u>		
Facility Name: He	ritage	Envi	ronmen	lal Se	rvices	Phone #: 708	3/739-	-/15:	1
Street Address: C	aval.	Bank		NE.		C	00 K		
City: Lemo					State	B: IL	Zip: 604	139	
Region: MAYW		Inspec	ction Dat			From: <u>8'3</u>	O An To:	4.00	رم2م
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			TY	PE OF FAC	HUTY				
Notified As: G T	r T S	LIAE	as F	SOF		As: <	1115	0 6 E	< _↑ F
Notified As: G Tr TS, WAF OSF SOF Regulated As: G Tr, TS, WAF, OSF SOF									
14		<u>N</u>	77/	PE OF INSP	ECTION				
CEI:	Sampling					Closed:	Other:		
CME/O&M:						ection of:			
					ED STATUS				
SQG:		Claimed N	lonhandler		ED STATUS	Other (Specify in Ne	arrative):		
	·			PARTA					
Noti	fication Da	te: 8 /	19180		nitial) or (su	bsequent) Notificatio	n.		
Initial Part A Date		12181				nended: <u>//</u> / <u>8</u> /			
Part A Withdrawa			<u>-</u> ' /			proved by (US)(IL) E		1	
			PART	R PFRMIT	APPLICATI				
Part B Permit Subr	mitted: (V)	or N				Final Permit Issued:		,	
			11.10					· <u>′</u> —	
11			<i>E</i>	NFORCEM		11 11 1 100	 		
Has the firm been			, ,	· · · · · · · · · · · · · · · · · · ·		N 41 185			
Illinois Attorney Ge	nerau: Y C		<u>-'' -</u>			Attorney: Y or 🕦	//		
				PRDERS IS:					
CACO: <u>4</u>		5	CAFO:	9/26	185	Consent Decree:	/	<u> </u>	-
Federal Court Orde	er:/_		State Cou	urt Order:	/	/ IPCB Order:	/_	_'	
			TSD FAC	CILITY ACT	TVITY SUMA	MARY			
		/	ALCONO.			78 84 0.7			
Activity by	ONP	or A?	CONDUCTED AS	in Done?	DOWN BOWN	bore st. 7 Exempt per 35 IAC, Sec.	<i></i>	n Annual	
Process Códe	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		110			35 IAC, Sec.	1990	1989	1935
501	У	N	У	N	<u> </u>	<i>\lambda'</i>	4	Ä	Y
	\ \ \ \	7	У	N	У	N N	Y	Y	N
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City Chicaco	City Lement	and the same of th		
State IL. Zip 60611	State TL	Zip 60439		
Phone # 312/675-8099	Phone # 708 /739	- 1,51		
PERSON(S) INTERVIEWED	TITLE	PHONE #		
Bob Garcin	Plant MANAGER	708/739-115		
INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #		
Chuck Grutman	ICPA / EPS	708/531 5920		
PREPARED BY	AGENCY/TITLE	PHONE #		
Chuck Gruntman	IEPA/CPS	709/531-5900		
SUMMARY OF A	PPARENT VIOLAT	TIONS		
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HAZADOUS **Facilit** WASTE DISPOSITION me: Heritage Environmental D08534926 USEPA #: IL **FORM** IEPA #: 0 3 <u>620007</u> Waste for which no determination Corperating Process for waste Wasta Harra Include hat & On Annual gen. on site. WARD TEST Report for: Lest Maritested Shipmen (Circle if present; Date of Last Arretteis JSEPA HAZ MASTO * cross out if not present) Rate of Generation Amount on Site On 8100.12 *Onsta3 1899 *** · 18 65 Disposition G G waste Petrolleum G blenoes into partis ONe Dool Y parts washer HAZ Waste Fuel Naphtha Accumulatio 00 21 te = 15 GAL G G bruss 50,000 HAZ. Waste Foo 1 G G G Cement Kilns 9-26-90 3-12-91 waste Systech У Y Fuel Foo 5 blensing Kost G G b-motods 2-25-91 F 120,2 erator Soil clean -ups Foo 1 =50,00 p waste flam. G G 2-11-91 OHM for Treatme Y F-5 DAINT SOLIAS 20,02 / Rollins 1-2441 Doo1 G G water contaminates List, HAZ F001 G 220,000 cal Rolliss for FooS Υ Y with lusten Wastes Year Water F G G F Lab packs Storage of waste for G G TWI / Ensco inchen ANY Y & other stores 2-27-91 H.E.S. for treats G G

^{*} All "NO" responses must be explained in narrative.

NON- HAZARDOUS Facilit WASTE DISPOSITION me: Heritage Environmental **FORM** IEPA#: 0 3 / / 6 2 Weste for which no determination Garagaino Process For wasta Weste Harre Include real & On Annual gen. on site. Water TSD) Last Maritastad Shipman Report for: (Circle if present; Onte of Last Arraysis JSEPA HEZ WESTE * cross out if not present) Rate of Generation Amount on Site · On Brobin · 0735103 *49, Disposition HES. for Treatment 20 04/ TANK bottoms Solios CID for Lanofill Soil chan-up G G Waste 8-30-90 HES. for treatment 2-28-91 oil G Contaminates 92690 HES. for treatment Treatment water from HES: 4 others 3-12-91 Waters Breshbe - Treatment G Crushas bulkinse unste metal Drums recyclina. G G

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^{*} All "NO" responses must be explained in narrative.

0311620007 - Cook County Heritage Environmental Services ILD085349264

NARRATIVE

Heritage Environmental Services, Inc. (H.E.S.) generates, stores, and treats hazardous waste. The operations at this location are divided into separate units - Transportation, Petroleum Management and the Treatment Plant.

The Transportation unit transports hazardous and non-hazardous waste for H.E.S. and its customers. Petroleum Management (which is actually part of Transportation) utilizes a multi-stop permit to pick up non-hazardous waste oil from automotive service garages. The Treatment Plant stores and treats hazardous and non-hazardous waste from off-site generators.

H.E.S. reclaims/recycles waste oil and hazardous waste mixtures. Hazardous waste fuel (subject to Part 726) is produced from ignitable hazardous wastes by separating phases within the wastes and by blending various waste streams. H.E.S. also produces on-spec waste oil fuel by using heat and chemicals to separate the oil from contaminants, such as water.

One of H.E.S.'s minor activities includes providing temporary container storage of hazardous waste lab packs and hazardous waste evidence for the Drug Enforcement Administration. The containerized wastes are placed in semi-trailers until arrangements for off-site disposal (incineration) can be made.

Hazardous Wastes Generated

- Hazardous Waste Fuel F001-F005, D001, K086 & D-Metals a mixture of ignitable hazardous waste and minimal amounts of non-hazardous waste oil from off-site generators. Sent to cement kilns (Systech, IN and Continental Cement, MO) and TWI incinerator for use as fuel.
- Waste Petroleum Naphtha D001 spent solvent from one parts degreaser owned and serviced by H.E.S. Blended into hazardous waste fuels on site.
- Waste Flammable Solids D001, F001-F005 spill pads and contaminated soil from H.E.S. Remediation Engineering's off-site service activities, strainer cleanings from secondary fuel blending process, and paint solids from other generators' waste. Sent to OHM (GA) for fuel blending or, if less than 5000 BTU, incinerated at CWM (IL) or Rollins (LA).

- Listed Hazardous Water F001-F005 & Others from bulking of off-site drums of water contaminated with listed hazardous wastes. Sent for incineration at Rollins (LA).
- Lab packs and other wastes received for storage but treated elsewhere any EPA HW # received from off-site clean-up projects such as school chemistry labs. Also DEA confiscated wastes. Sent to H.E.S. (IN) for treatment, TWI (IL) for incineration, or Ensco (AR) for incineration.

Non-Hazardous Wastes Generated

- Solids Non-hazardous tank bottoms, soil clean-ups, cut up plastic drums, or waste from other generators. Sent to CID landfill (IL) or H.E.S. (IN) for treatment.
- Waste Oil Non-hazardous loads of waste oil that are too difficult to completely treat at this location. Sent to H.E.S. (IN) for further treatment.
- Treatment Water other generators' contaminated wastewater or reaction water from the phase separation of waste oil and water. Sent to H.E.S (IN) or Breslube (IN) for treatment.
- Crushed Empty Drums RCRA empty metal containers are crushed and sent to US Steel for use in their furnaces to recover the steel.

Hazardous Waste Units

- Container Storage SO1 containers are stored on a diked, concrete pad and in several locked semi-trailers. Incompatibles are stored in separate trailers or on opposite ends of the concrete pad.
- Tank Storage SO2 Storage tanks are located on a concrete pad with concrete walls. The tank farm includes initial receiving tanks (VRT 1 VRT 4), cone bottom gravity separation tanks (CB 1 CB 4) and product (blended hazardous waste fuel) storage tanks (SF 1 SF 6 and SF 7 which was called OS 2 before).
- Treatment Tanks TO1 Heat treatment/chemical separation occurs in tanks HT 2 HT 5). Tank HT 1 has not been used for hazardous waste but is used for recycled fuel oil, per Garcia.
- Treatment in containers TO4 was not occurring.

0311620007 - Cook County Page 3

 $\underline{\text{No}}$ apparent violations were noted during this inspection. Violations identified during the last inspection on September 28, 1990 were resolved.

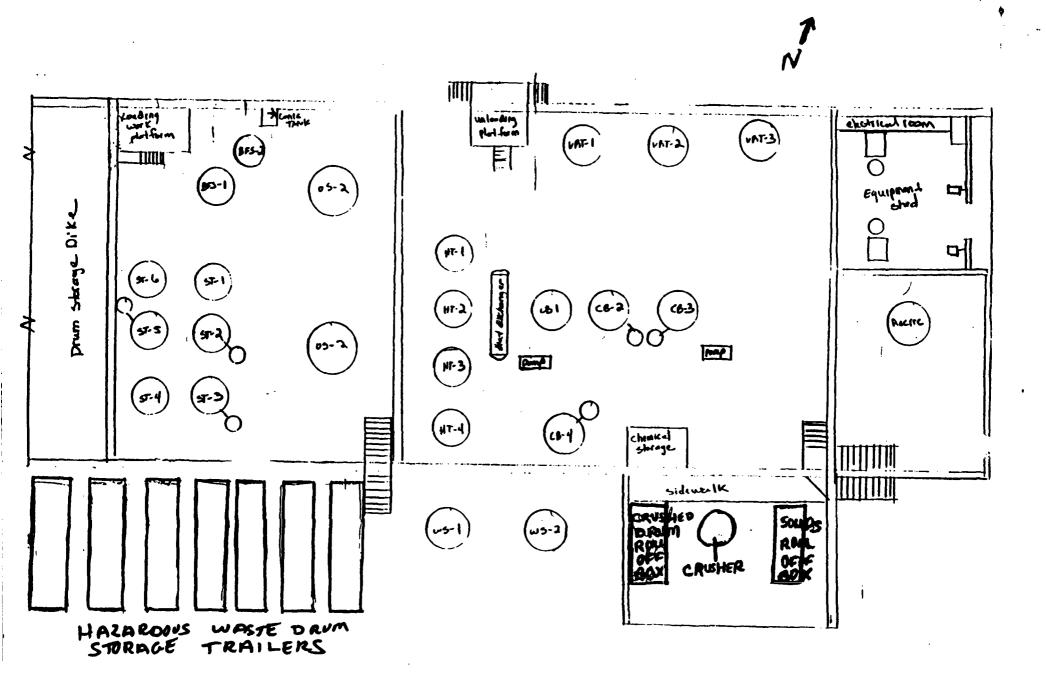
Resolved Apparent Violations

725.294

 No level sensing devices on hazardous waste storage tanks
 contact with RCRA Hotline and EPA Region V supports the H.E.S. position that a "manual" system complies with the regulations.

728.150(a)(2) - No accumulation dates on LDR containers in storage - dates present.

CJG:fs:33

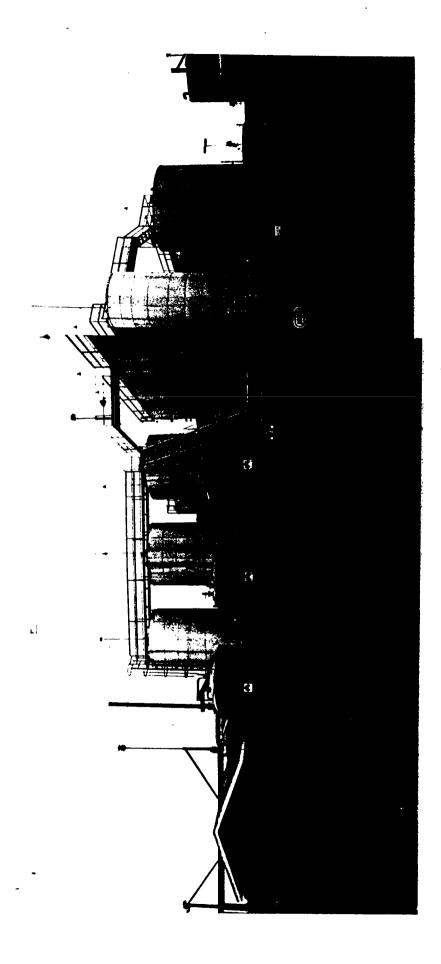


Lean, ... il ILD085349264 BARGE SLIP Part A, Revision 01/03/90 Attachment A-1 ᢆ 6100 Piete And frome Promoved Fleation Dubbing Truck Transfer Area (Bitemine) ROAD Perking Lei DES PLAINES RIVER Maintenance Shop CHICAGO SANITARY AND SHIP CANAL ŝ 000 įjO Van Trailer Storage Area Container Storage Area Form The DIKE RECEIVED MAR 2 6 1990 IEPA-DLPC PARCEL "Y" HERITAGE REMEDIATION/ENGINEERING, INC 0 20 40 60 80 100 HERITAGE ENVIRONMESTORAGE TREATMENT Scole in Feet L SERVICES LITY LEMONT, 1

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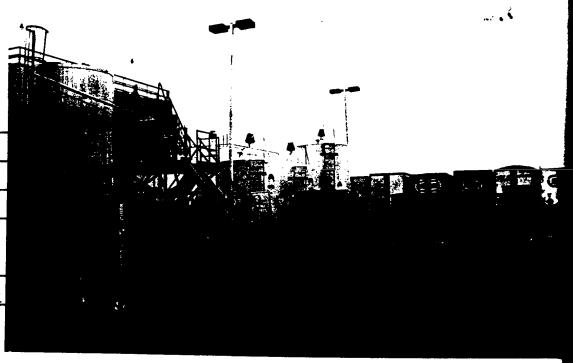
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NOIS ENVIRONMENTAL ECTION AGENCY PHOTOGRAPH

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INOIS ENVIRONMENTAL PROTECTION AGENCY PHOTOGRAP

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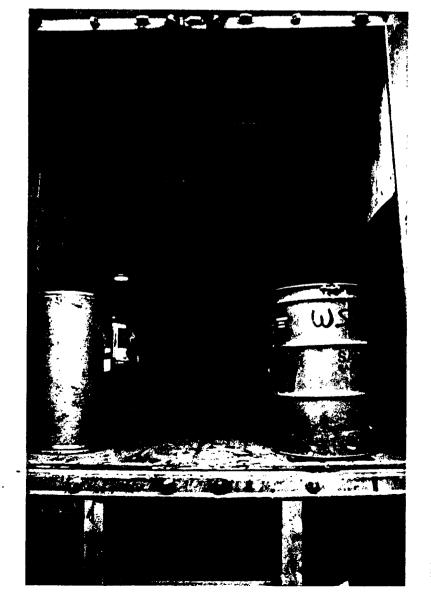
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' CHARLES GRUNTMAN

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COMMENTS:

REVISION 1 (8/15/88)

								KET1310N 1 (0/13/03/
Area	Class	90 Day F:U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
отн	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes No				RECEIVED 1 9 SEP 1991 IEPA/DLPC
отн	1		3	Did the generator follow the procedures specified in this section in making its determination? Yes No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number?	✓			RECEIVED 1 9 SEP 19 IEPA/DLP
				Has the generator obtained a USERA identification number: Yes No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes No				
					-			
			_					

Area	Cíass	90 Day F U Req	Key Ltr Sub Sec	Requirement -	Comp	parent liance?	Not Applicable	Remarks or Comment No
MAN	2		a b	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No No				

Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Allinois? Yes No N/A b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? Or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No No N/A Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)? Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes No 1 2) Obtained the handwritten signature and the	Area	Class	90 Day F U Req	Key Ltr Sub Sec	* Requirement	Comp	parent bliance?	Not Applicable	Remarks or Comment No
date of acceptance by the initial transporter? Yes No	MAN	2	neq	a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? Or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)? Section 722.123: Use of the Manifest For each manifest received, has the generator: 1) Signed the certificate by hand? Yes No No 2) Obtained the handwritten signature and the date of acceptance by the initial transporter?		No	NO	Ino Mo.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
			С	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes No N/A Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes No N/A				No bulk rail or water shipments

Area	Class	90 Day F/U Reg	Key Ltr Sub Sec	Requirement		parent fiance?	₹	Remarks or Comment No
,			Sec	PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements	103	No	Not	
ОТН	1	X		Section 722.130: Packaging	<u></u>			
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
нто	1	χ		Section 722.131: Labeling	1			
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
нто	1	Х		Section 722.132: Marking				
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No] 			
			ь	Is each package of hazardous waste which is ready for transportation off-site marked with:				
				- The generator's name and address? Yes No				
				 The manifest document number associated with the container? Yes No 				
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
отн	1	X	a	Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.		2	Transporter Supplies. N.A. No Accumulation

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping	/			
			a b	Has the generator retained for a period of three years: - A copy of each signed manifest? Yes No - A copy of each annual report?				
			Ь	Yes No No - A copy of each exception report? Yes No N/A				
			С	 Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A 				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A				
			đ	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent bliance? No	Not Applicable	Remarks or Comment No.
OTH	2			Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266. Section 722.142: Exception Reporting Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and		<u>/</u>	None requires

Area	Class	90 Day F/U	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Comment No.
		Req	Sec		Yeş	No	Not /	
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A				
ОТН	1			Section 722.143: Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				None regulato

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	1 ' 1		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Not Applicable	Remarks or Comment No.
ОТН	1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. Mhen citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				NO Exports																						

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		mpliance?		n Apparent Compliance?		Remarks or Comment No.
MAN	1		b1 b2	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and Has the importer or his agent signed the manifest in place of the generator; and Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A Is the person importing hazardous waste using manifests obtained from the Agency? Yes No			Not	No imports		

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?		Remarks or Comment No.
ОТН	2	X		PART 722 GENERATOR STANDARDS Subpart G: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A NOTE: If the answer to either of the preceeding questions is No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).			✓	No farmina Activity.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General				
				Section 723.110: Scope				
				Has the firm ever transported hazardous waste into the United States from abroad? Yes No				
				Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes No				
				NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
отн	1			Section 723.111: USEPA Identification Number				
			a	Has the transporter obtained a USEPA identification number?				
отн	1	Х		Section 723.112: Transfer Facility Requirements	/			
				Has a transporter of hazardous waste stored manifested shipments of such waste:				
		:		- For a period of 10 days or less? Yes No				
			:					

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
Are	Cla	F/U		Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes No No NOTE: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.			Not App	Remarks or Comment No.

	V			ā	
Area Class	Honor Key Ltr Day JU Sub leq Sec	Requirement	In Apparent Compliance? Yes No	Not Applicable	Remarks or Comment No.
		PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart B: Compliance with the Manifest System and Recordkeeping			
MAN 1/2		Section 723.120: The Manifest System			
	a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes No Prior to transporting hazardous waste, has the transporter			
	c	apparently: - Signed and dated the accompanying manifests? Yes No - Returned a signed copy to the generator before leaving the generator's property? Yes No Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes No Has the transporter who delivers hazardous waste to another transporter or to the designated facility:			•

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirem e nt .	parent ; liance?	Not Applicable	Remarks or Comment No.
			560	1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes No		Z	
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes No			
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes No			
			е	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes No N/A			
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes No N/A			
			g	Has the transporter who transports hazardous waste out of the United States: $N_i \Lambda_i$			
				1) Indicated on the manifest the date the hazardous waste left the United States? Yes No			
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes No			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes No 4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes No Section 723.121: Compliance with the Manifest Has a transporter received waste from a Reduced Requirements generator? Yes No NOTE: If "No", skip Section 723.121. If "Yes", answer the following questions: Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes No AND If "Yes", is the transporter recording on a log or shipping paper: 1) Name, address and USEPA ID number of the generator of the waste; AND 2) Quantity of waste accepted; AND		Z	

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
				3) All shipping information required by U.S.D.O.T; AND			
				4) The date the waste is accepted? Yes No AND			
				Does the transporter carry this record when transporting waste to the reclamation facility? Yes No			
				AND			
				Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes No			
				Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:			
				1) The designated facility on the manifest? Yes No			
				OR			
				2) The alternate designated facility if the hazard- ous waste cannot be delivered to the designated facility because an emergency prevented de- livery? Yes No N/A			
				OR			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
ОТН	2		b c	3) The next designated transporter? YesNoN/A			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No.
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes No N/A				
			е	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes No N/A				
			е	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	Not Applicable	Remarks or Comment No.
				PART 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart C: Hazardous Waste Discharges				
ОТН	1			Section 723.130: Immediate Action			\checkmark	
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes No				No Discharage
			С	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes No				
отн	1	X		Section 723.131: Discharge Clean-Up			1	
				After a discharge of hazardous waste did the transporter:				
				- Clean-up the discharge? Yes No				
				- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No		Not Applicable	Remarks or Comment No
ОТН	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HMM Facilities and Interim Status Qualifications Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes No N/A 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes No N/A 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A	Yes	No	ON	

	_							
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance? No		Remarks or Comment No
отн	1			Section 703.151: Application by New HWM Facilities			1	
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes No				
				Is the facility only operating with a RCRA permit? Yes No				
i				NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.				
ОТН	1			Section 703.152: Amended Part A Application	1			
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:				
				 No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identi- fication and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes No N/A 				
				2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A				
				NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				

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Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent :	Not Applicable	Remarks or Comment No
ОТН	1			Section 703.154: Prohibitions During Interim Status	V		-	
				During interim status, has the facility refrained from:				
			a	 Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No 				
			b	 Employing processes not specified in Part A of the permit application? Yes No 				
			С	 Exceeding the design capacities specified in Part A of the permit application? Yes No 				
отн	1			Section 703.155: Changes During Interim Status	V			
			d	NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. Did the owner or operator submit a revised Part A permit				
				application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes No N/A				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Hequirement	In Apparent Compliance? Yes No		Remarks or Comment No
отн	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes No NA		NON	

Class	90	Key		1			•	
	Day F U	l tr	Requirement		In Apparent Compliance?		Remarks or Comment No	
U	Req	Sub Sec		Yeş	No	Not Applical	TIGHTS OF COMMON NO	
			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards					
1			Section 725.111: USEPA Identification Number					
			Has the facility obtained a USEPA identification number?				,	
1			Section 725.112: Required Notices			V	No foreign	
		a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				No foreign Waste Accepted	
		b	during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A					
1			Section 725.113: General Waste Analysis	/				
		al	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No					
	1	1	1 a b	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number? Section 725.112: Required Notices Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 III. Adm. Code 703, 703 and 725? Yes No N/A Section 725.113: General Waste Analysis Al Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number? Section 725.112: Required Notices Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A Section 725.113: General Waste Analysis al Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number? Section 725.112: Required Notices Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A Section 725.113: General Waste Analysis al Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, sXorage or disposal?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number? Section 725.112: Required Notices Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A Section 725.113: General Waste Analysis al Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal?	

Ares	Class	90 Day F≀U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No		Z	
			a4	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator developed a written analysis plan? Yes No N/A NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes No			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	In Apparent Compliance? Yes No		Remarks or Comment No
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No	les	No	Not	
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes No				
				2) The test methods which will be used to test for those parameters? Yes No				
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No				

Area	Class	90 Day F∵U Req	Key Ltr Sub Sec	Requirement		In Apparent Compliance? Yes No		Remarks or Comment No
				6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: -				
ОТН	1	X	С	NOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes No N/A Section 725.114: Security	<u>/</u>			
				Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		In Apparent Compliance? Yes No		Remarks or Comment No
				Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes	Yeş	No	Not Applicable	

							·	Y
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	Comp	In Apparent Compliance?		Remarks or Comment No
ОТН	2			Section 725.115: General Inspection Requirements	/**/	No	Š	
UIII.				•	V-			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes No				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No				
			bl	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No No				·
			b2	Is the written schedule at the facility? Yes No				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes No				
			ь4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes No				

					 		,
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No		Remarks or Comment No
	•		c	- The items and frequencies, where applicable, called for in Sections: - 725.274 (Containers): - 725.294 (Tanks)) - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.447 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the applicable section. Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes No No Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes No N/A Does the owner or operator record the results of inspections in a log or summary? Yes No The date and time of the inspection? Yes No The name of the inspector? Yes No The name of the inspector?		Not	

							T ==	Y
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
OTH	2		al a2	- A notation of the observations made? Yes No No Or N/A - The date and nature of any type of corrective action? Yes No N/A Section 725.116: Personnel Training Does the facility have a training program? Yes No No Or N/A NOTE: If "No", skip to Section 725.117, Page TSD-B-10. Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No No Is the training program formalized, i.e., written down? Yes No No No No No No No No No No No No No	Ì			Remarks or Comment No
				and replacing facility emergency and monitoring equipment? Yes No N/A				·

Area	Class	90 Day F ₁ U Req	Key Ltr Sub Sec	Requirement	parent liance? No	₹	Remarks or Comment No
			b	B) Key parameters for automatic waste feed cutoff systems? Yes No N/A C) Communications or alarm systems? Yes No N/A D) Response to fire or explosion? Yes No N/A E) Response to ground water contamination incidents? Yes No N/A Does the program cover the implementation of the contingency plan? Yes No Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A Has the facility conducted an annual review of the initial training? Yes No N/A Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No No	NO		

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Area	Class	90 Day F U	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Comment No.
`	J	Req	Sub Sec		Yeş	No	Not	
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No				`
		·		3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No				
		} } !	е	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period/of at least three years? Yes No N/A				
ОТН	1	X		Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	1			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes No				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes No				
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Area	Class	90 Day F/U	Key Ltr Sub	Requirement		parent bliance?	Applicable	Remarks or Comment No
		Req	Sec		Yeş	No	Noı	
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No				
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or/explosion? Yes No				
				4) Damage the structural integrity of the device or facility containing the waste? Yes No				
				5) Through other like means threaten human health or the environment? Yes No				
								·

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No		Compliance?				Compliance?		Compliance?		Compliance?		Compliance?		Compliance?		Comptiance?		Compliance?		Not Applicable	Remarks or Comment No.
		Req	Sec	Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A NOTE: A "Yes" answer is a violation of the location standard.	Yeş	No	ION >																			

			Key		<u> </u>		<u></u>	
Area	Class	90 Day	Ltr			parent liance?	Applicab	
¥	ö	F.U Req	Sub	Requirement	1			Remarks or Comment No
			Sec		Yeş	No	Not	
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention	,			
ОТН	1	X		Section 725.131: Maintenance and Operation of Facility	/			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
				Air;Soil; orSurface water,				
				which would threaten human health or the environment? Yes No				
ОТН	1	Х		Section 725.132: Required Equipment	/			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	 An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A 				PAGINCY
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No N/A				telephones pull boyes

Area	Class	90 Day F:U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
ОТН	1	X	c d	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No N/A - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes No N/A NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes No N/A - Fire protection equipment? Yes No N/A - Spill control equipment? Yes No N/A - Decontamination equipment? Yes No N/A NOTE: Any "N/A" answer must be explained in the Comments.	V		•	fire Ext. Spill page, abordant. 40,000 Eal tank 8 canal. monthly monthly Daily Daily Daily

		90	Key		T	In Apparent		
Area	Class	Day F:U	·Sub	Requirement		oparent oliance?	Applicable	Remarks or Comment No.
-		Req	Şec		Yeş	No	No	
ОТН	1	X		Section 725.134: Access to Communications or Alarm Systems	/			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A			1	·
			b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes No N/A				
отн	1	Х		Section 725.135: Required Aisle Space				
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
ОТН	2			Section 725.137: Arrangements with Local Authorities	1			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

		1	—		 		
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes No N/A			link County police Lement fire pept
				2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A			
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A			II. ESOA
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes No N/A			Situen Cross,
				NOTE: Any "N/A" answer must be explained in the Comments.			
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes No N/A			
]		

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Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		oparent oliance?	Remarks or Comment No
отн	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Contingency Plan	V		
			a	Is a plan available? Yes No NOTE: If the answer is "No", skip to 725.155.			
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No			
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A	,		
ОТН	2	l		Section 725.152: Content of Contingency Plan	/		
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes No 2) Explosions? Yes No			

Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		In Apparent Compliance? Yes No		Remarks or Comment No.
		Req	c d	3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No Does the plan describe the arrangements agreed to by: 1) Local police and fire departments? Yes No 2) Hospitals? Yes No 3) Contractors? Yes No 4) State and local emergency response teams? Yes No Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes No Is the list of emergency coordinators up-to-date? Yes No Oboes the plan identify: 1) A list and physical description of all emergency equipment at the facility? Yes No No No Oboes the plan identify:	Yeş	No	Not Appli	

Area	Class	90 Day F/U	Key Ltr	Requirement		parent pliance?	Applicable	Remarks or Comment No.
		Req	Sub Sec		Yeş	No	Not A	
				 2) A brief outline of the capability of each piece of emergency equipment? Yes				
			е	Is the list of emergency equipment up-to-date? Yes No				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes No N/A				
			f	Does the plan identify the signal to be used to begin evacuation? Yes No				
			f	Are alternate evacuation routes identified? Yes No				
ОТН	2			Section 725.153: Copies of Contingency Plan	V			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes No				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes No				
				TEN D 3				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent No	Not Applicable	Remarks or Comment No.
отн	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever:	V			
			a b	 Applicable regulations are revised? Yes No The plan fails in an emergency? Yes No N/A 				
			С	The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				
			d	4) The list of emergency coordinators changes? Yes No				
отн	2		e	5) The list of emergency equipment changes? Yes No				_
5	•			Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No				Paul Zajec

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes No Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes No Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes No NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.				1988 fine bulloine

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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance? No	Not Applicable	Remarks or Comment No
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System	/			
				Does the facility accept waste from off-site? Yes No NOTE: If the answer is "Yes", complete this section.				
			al	If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility: 1) Sign and date each copy to certify that the hazardous waste covered by the manifest was				
			a2	received? Yes No No No No Note any significant discrepancies in the manifest or each copy of the manifest?				
			a3	Yes No N/A 3) Immediately give one copy of the completed manifest to the transporter? Yes No No				
			a 4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				
			a 5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yeş No		Compliance?		Compliance?		Not Applicable	Remarks or Comment No.
MAN	2		b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes No N/A Does the facility initiate shipments of hazardous waste? Yes No NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist. Section 725.172: Manifest Discrepancies NOTE: If there are no manifest discrepancies, mark the "N/A" column. Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes No If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No No								

	Υ	·		Y				
A788	Class	90 Day F/U	Key Ltr	Requirement	In App.		Applicable	Remarks or Comment No
`		Req	Sub Sec		Yes	No	Not A	
ОТН	2			Section 725.173: Operating Record	./			
			a	Does the owner or operator have a written operating record at the facility? Yes No				
			b	Is the information in the operating record being main- tained until elosure of the facility? Yes No				
			b	Does the operating record contain the following information:				
				 A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No 				
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes No				
				3) The location of each hazardous waste within the facility? Yes No No				
				4) The quantity of each hazardous waste at each location within the facility? Yes No				
				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A				
1	1						ı	

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Area	Class	Day F.U Req	Sub Sec	Requirement	Com Yeş	No	Not Appl	Remarks or Comment No
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes No N/A				
				7) Records and results of waste analyses and trial test performed as specified in Sections:				
				- 725.113 (Gen. Waste Analysis)? Yes No				
				- 725.293 (Tanks)? Yes No N/A				
				- 725.325 (Surface Improvements)? Yes No N/A				
				- 725.352 (Waste Piles)? Yes No N/A				
				- 725.373 (Land Treatment)? Yes No N/A				
				- 725.441 (Incinerators)? Yes No N/A				
				- 725.475 (Thermal Treatment)? / Yes No N/A				
				- 725.502 (Chem., Phys., Bio. Treatment)? Yes No N/A				
				8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes No N/A				

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent pliance? No	Appl	Remarks or Comment No
				Records and results of inspections as required by Section 725.115(d)? Yes No NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action. Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes No N/A - 725.376 (Land Treatment)? Yes No N/A - 725.378 (Land Treatment)? Yes No N/A - 735.380(d)(1) (Land Treatment)? Yes No N/A - 725.447 (Incinerators)? Yes No N/A NO N/A NO N/A NOTE: Data required under 725.194 must be kept throughout the post-closure period.				

Area	Class	90 Day F.U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
отн	2		С	11) All closure cost estimates required by Section 725.242? Yes No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A N/A N/A N/A N/A N/A N/A N/A			No closure yet.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
ОТН	2			Section 725.175: Annual Report	/			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
отн	1			Section 725.176: Unmanifested Waste Report				
				Does the facility accept hazardous waste from off-site? Yes No				1 time
		!		NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No Section 725.177: Additional Reports	W			·
			a b	Has the owner or operator submitted to the Agency, as required, reports concerning: 1) Releases, fires, explosions as specified in Section 725.156? Yes No N/A 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes No N/A 3) Facility closure as specified in Section 725.215? Yes No N/A				-

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	t App	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS MASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				
CLO	1			Section 725.212: Closure Plan	V			
			a	Was the most current facility closure plan available during the inspection? Yes No				
				Was the closure plan submitted to the Agency within the time frames specified below:				Submitter : 71
				- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes No N/A				Submittee with Pt B. Application
				- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A				
				- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A				
		• 1		- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A				

Area	Class	90 Day F/U Reg	Key Ltr	Requirement	Comp	parent liance?	App	Remarks or Comment No
FIN	1	Req	Sec	- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes No N/A	Yoş	No	J	

Area	Ciess	90 Day F.U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				
отн	1	χ		Section 725.271: Condition of Containers	1			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
ОТН	1	X		Section 725.272: Compatibility of Waste with Containers				
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
ОТН	1	х		Section 725.273: Management of Containers	1			
			a	Are containers of hazardous waste always closed during storage? Yes No				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				
ОТН	2			Section 725.274: Inspections				
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes No				,

	·							
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
	_			NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.		/		
ОТН	1	X		Section 725.276: Special Requirements for Ignitable or Reactive Wastes Are containers holding ignitable or reactive waste located at least 50 feet from the property line?	V			
ОТН	1	X		Section 725.277: Special Requirements for Incompatible Wastes Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?	✓ 			·

REVISION 1 (8/15/88)

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	Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
					PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems				
					Section 725.290: Applicability				
					Does the facility store or treat hazardous waste in tanks? Yes No				
					If "No", skip Subpart J.				
					NOTE: Tanks or sump pits that serve as part of a second- ary containment system to collect or contain releases are not subject to Subpart J requirements.				
					Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No				
					NOTE: Failing the filter test means that the waste contains free liquids.				
	0TH	2			Section 725.291: Assessment of Existing Tank Systems			ļ	
				a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No				
					NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				
							: 		
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Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components a For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following:	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	oparent oliance?	ot Applicable	Remarks or Comment No
1) design standards for tanks and ancillary equipment; NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave. 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures?			F/U	b b	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave. 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and			Not Appli	

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance?	Not Applicable	Remarks or Comment No.
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No	,			
отн				Section 725.293: Containment and Detection of Releases	<u>~</u>		-	
			aſ	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes No N/A				Truks have Seranopy Contament
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A				
				<u>or</u>				
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A	: 			
			a 5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	ot Applicable	Remarks or Comment No.
				Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A	Yeş	No	Not	
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).				
			с4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A				
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.				
			đ	Does the secondary containment have one or more of the following:				
	i			 a liner (external to the tank); or 				
		}		2) a vault; or				
				3) a double-walled tank; or				
		}		4) an equivalent device (approved by the Board)? Yes No N/A				
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.				
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

Area	Class	90 Day F/U	Key Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No.
j		Req	Sec		Yeş	No	Not	
	-			 above ground piping (exclusive of flanges, joints, valves and connections) that are in- spected daily; 				
				 welded flanges, joints and connections that are inspected daily; 				
				 sealless or magnetic coupling pumps that are inspected daily; and 				
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A				
			i	Until such time as <u>seco</u> ndary containment is provided, are the following requirements being met for all tank systems:				
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A				
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A		:	,	
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes No N/A \				
				TCD 1.				

Area	Class	90 Day F-U	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Comment No.	
		Req	Sec		Yeş	No	Not		
ОТН	1	χ		Section 725.294: General Operating Requirements					
			b1 & 2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes No				manual inspections Durines filling	
			ь3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A					
			С	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A					
ОТН	2			Section 725.295: Inspections	\checkmark				
			С	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes No					
ОТН	1	X		Section 725.296: Response to Leaks or Spills and Dispo- sition of Tank Systems	<u> </u>				
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No					
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).					

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Réquirement	in App Compl	parent pance?	Not Applicable	Remarks or Comment No
CLO	1			Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after returning the tank system to use? Yes No N/A Section 725.297: Closure and Post Closure Care NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298. At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes No If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				No closure, yet

								₇
Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement In Apparent Compliance? Yes No		4 App	Remarks or Comment No.	
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes				
				Are ignitable or reactive wastes stored in tanks? Yes No				
				NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No				
				NOTE: Tank systems used <u>solely</u> for <u>emergencies</u> may store ignitable/reactive wastes.				
			Ь	Are there proper protective distances between the waste management area and the facility boundary line? Yes No				
отн	1			Section 725.299: Special Requirements for Incompatible Wastes				
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A				

<u></u>			Key			a a	T
Area	Class	90 Day	Ltr	Requirement	In Appare Complian		Remarks or Comment No
⁴	٥	F () Req	Sub Sec		Yeş N	Not A	
ОТН	1			Section 725.300: Waste Analysis and Trial Tests			
				In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A			
				or			
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A			
				NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.			

Area	Class	90 Day F U	Key Lir Sub	Requirement		parent liance?	∢	Remarks or Comment No.
1	i	Req	Sec		Yes	No	Not	
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery				
				NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.		:		
отн		х		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel				•
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A				
ОТН				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel	/			
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A				
ОТН		X		Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel	/			
ОТН	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A				
				and				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No		Not Applicable	Remarks or Comment No.
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes No N/A				
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes No N/A				
	I	•	С	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes No N/A				
	I		đ	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes No N/A				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes No N/A				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes No N/A				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes No N/A				

Area	Class	90 Døy F U Req	Key Ltr Sub Sec	Requirement	·		Not Applicable	Remarks or Comment No.
ОТН	I		b1	PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart E: Used Oil Burned for Energy Recovery Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery Has the marketer conducted an analysis of the used oil? Yes No N/A	1		2	
	11		b3	combustion devices pursuant to 726.141(b)? Yes No Has the marketer re-notified USEPA as to used oil management activities? Yes No				·
	II		b4	Does the marketer have an invoice system such that receiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes No				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
	II		b5	Does the marketer have the written notice from their clients which acknowledges that they have notified USEPA and, if the client is a burner, that the oil will only be burned in a proper device pursuant to 726.141(b)? Yes No			
	II		ь6	Has the marketer provided the same written notice to any other marketer from which waste oil has been received? Yes No N/A			
	II		ь6	Are copies of oil analysis, proper operating logs and invoices being maintained for three years? Yes No			
отн				Section 726.144: Standards Applicable to Burners of Used Oil Burned for Energy Recovery		کید	
				NOTE: Used oil burned by the generator is regulated under this subpart unless the analysis documenting that the oil meets the specifications has been done.			
	I		a	If the burner uses off-specification oil, then do they have an industrial furnace or boiler as required in 726.141(b)? Yes No N/A			
	11			Has the proper notification been given to USEPA? Yes No			
				NOTE: Explain your response in the remarks column.			
				NOTE: Explain your response in the remarks column.			•

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

L General Information	18				
Facility:	Her	itace	Envir	en menta	Services
U.S. EPA ID No.:	3			03	11620007
Street:	CA	ral B	ock Re	. N	ε
City:	Len	nt_	Su	ete: IL_ Z	ip: <u>60/3</u> 9
Telephone:	_7	08/ 739	7-1151		
Inspection Date: Weather Conditions:	L	Time	. <u>330 (</u>	pm)	
weather Chainons:					
Inspectors:	Name C.J.	_	Agency/Titl		<u>1 708 / 531 - 5900</u>
Facility Representative	es: <u>B.b</u>	GARGA	Plaz	MAYAS	er 708/729-115
See Appendix B to de	termine which	of the followin	LDR waste o	ategories the f	acility manages:
	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents		<u> </u>			
F020-F023 and F026-F028			-		
California List		_		1	
First Third [40 CFR 268.10]		<u> </u>			
Second Third [40 CFR 268.11]	•			<u> </u>	
Third Third [40 CFR 268.12]		_			RECEIVED
* See Appendix A		·			1 9 SEP 1991

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

fuel blensing of waste solvents doils and temanifestine other amountaris was stored At H.E.S.

LDR Waste Management:

H.E.S. stores waster for other Generators.

They can harole almost my waster for stornous; however, the primary business

4 Feel blanding.

Summary:

No LDR violations observes

PECTIVED

1 3 GEP 759

Signature Charle of Grunton

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

IL WASTE IDENTIFICATION

1.	F001 through F005 spent solvents:
2	F020-F023 and F026-F028 dioxin-containing wastes:
•	California List Wastes (See Appendix A):
.	First Third Wastes [40 CFR 268.10]:
•	Second Third Wastes [40 CFR 268.11]:
.	Third Third Wastes [40 CFR 268.12]
chara the t by 03 waste tven	te: Effective D9/25/90, large quantity generators and TSDs are required to use the toxic cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determing the state of the comply with this new requirements must comply with this new requirements with the state of the
hara he t y 03 leste lven hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determing oxicity characteristic (TC). Small quantity generators must comply with this new requirements as the seconsidered "newly idented by U.S. Entry will be considered "newly idented by U.S. Entry will be regulated under 40 CFR Part Z&B only after they are evaluated by U.S. Entry will be regulated by U.S. Entry will be regulated by U.S. Entry will be republished by U.S. Entry will be required to the EP toxicity.
hara he t y 03 leste wen hara	eteristic (55 FR 22531).
hara he t y 03 leste wen hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determing oxicity characteristic (TC). Small quantity generators must comply with this new requir/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly idents. They will be regulated under 40 CFR Part 268 only efter they are evaluated by U.S. E if they are characteristic for a constituent previously covered under the EP texicity exeristic [55 FR 22531]. The Code Determination Have all wastes been correctly identified for purposes of compliance with
hara he t y 03 leste wen hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determination contents to the considered of the extraction procedure (EP) for determination that comply with this new requirements and comply with this new requirements. We start they are considered "newly identified for purposes of compliance with 40 CFR Part 268?" Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?"
hara he t y 03 este ven hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determination that the considered (TC). Small quantity generators must comply with this new requir/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly idents. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. E if they are characteristic for a constituent previously covered under the EP toxicity eteristic (SS FR 22531). The Code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes No
hara he t y 03 este ven hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determination contribution of the extraction procedure (EP) for determination that contribution is a considered "newly identified for purposes of compliance with this new requirement of the procedure of the procedu
hara he t y 03 este ven hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determination contents that comply with this new requir/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly idents. They will be regulated under 40 CFR Part 268 only efter they are evaluated by U.S. E if they are characteristic for a constituent previously covered under the EP toxicity exeristic ES FR 225313. The Code Determination Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268? Yes No If no, list below:
hara he t y 03 este ven hara	cteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determination contribution of the extraction procedure (EP) for determination that contribution is a considered "newly identified for purposes of compliance with this new requirement of the procedure of the procedu

	2.			aracteristic waste code been assigned, OCFR 268.9(a)]	where a listed waste				
		Yes	No	NA					
		Comments							
	3.	Has multi-s	ource leachate	ocen assigned the F039 waste code?" [40 CFR 261.31]				
		Yes	No	na 🗸					
		*leachate de individual w	rived exclusively aste codes.	from F020-F023 and/or F026-F028 dioxin w	astes retains the				
		If yes, was s 22623]	ingle-source les	chate combined to form multi-source l	eachate? [55 FR				
		Yes	No	•					
		Comments	·		~				
C.	Does 1.	F001-F005	contaminated s	ing wastes (national capacity variance oil and debris resulting from a CERCL on (expires - 11/08/90). [40 CFR 268.30	A response action				
		Yes	No	List					
	2.	Dioxin con RCRA con	rective action (nd debris resulting from a CERCLA rexpires - 11/08/90). [40 CFR 268.31(b)]					
		Yes	No 🗸	List					
	3.	California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]							
		Yes	No _	List					
	4.	K048-K052 (b)]	! petroleum was	tes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35				
		Yes	No_	List					
	5.	incineratio K014, K02 K113, K114 P094, P097 U223, U23	n set in the Sec 3, K027, K028, 1 4, K115, K116, 1 7, P109, P111, U 5 (expires - 06/0	ed with wastes that had treatment stand and Third rule - F010, F024, K009, K01 K029, K038, K039, K040, K043, K093, 1 P039, P040, P041, P043, P044, P062, P0 D28, U058, U069, U087, U088, U102, U 8/91). [40 CFR 268.34(d)]	0, K011, K013, K094, K 095, K096, 171, P085, P089,				
		Yes	No 🗸	List					
			seaq tud	الهلا	·				

6.	Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]										
	Yes	No V	List								
7.	P012, P036 268.35(c)]	ing nonwastewat , P038, P065, P0	ters - F039, K031, K084, K101, K102, K106, P010, P011, 87, P092, U136, U151. (expires -05/08/92). [40 CFR								
	Yes	No 🚣	List								
8.	(nonwaster	vaters), D008 (le vaters) (expires	fied as hazardous based on a characteristic alone: D004 and materials stored before secondary smelting), D009 - 05/08/92). [40 CFR 268.35(c)]								
	Yes	No 🗸	List								
9.	Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]										
	Yes	No 🗸	List								
	*Note: Inco	rrect reference [40 CFR 268.2(a)(7)) in Third Third rule.								
10.	RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]										
	Yස	No _	List								
11.	radioactive	/hazardous wast	8.10, 268.11, and 268.12 that are mixed es (expires - 05/08/92)*. [40 CFR 268.35(d)]								
	Yes	No_	List								
	*Note: 40 C	FR 268.10 and 268	.11 wastes incorrectly omitted from this variance in the Third								

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IIL GENERATOR REQUIREMENTS

A.	Treats	bility Group/	[reatmen	t Standard Id	entificat	ion*		
		This informationer documentation			en LDR n	otifications. If	not, waste pro	file data
	1.	F001-F005 S	pent Solve treatabilit	ent Wastes: D y group/treatn	oes the p	generator correction for each F	atly determine -solvent?	the
		Yes	No	NA_				
		If available, l	ist each w	aste code and	check th	ne correct treats	bility group.	
		Waste Code		Wastewater*	•	Nonwastewat	<u>er</u>	
								
		*less than 1% F005 solvent o	by weight constituent	total organic d s listed in 40	cfR 268.	CC), or less than il, Table CCWE.	1% by weight to [40 CFR 268.2(f)	otal F001-)(1)]
		Comments				- <u>-</u>		
	2.					Does the genera standard for each	•	
		Yes	No	NA.	\checkmark			
		If yes, list ea	ch waste o	code and chec	k the co	rect treatability	group.	
		Waste Code		Wastewater*	•	Nonwastewa	ter	
								` \
		Comments						
		*Less than 1% [40 CFR 268.2	TOC by we	ight and less t	han 1% to	tal suspended sol	ids (TSS) by we	ight.
	3.	First, Second	d, and Thi	ird Third Was	tes:			
				erator correcti ent standard fo		nine the approprieste?	riate treatabili	у
		V		No	·NA	/		

	•	•	Nonwastewater
	_	-	
* Less t (155) wi 5% by we than 4%	han 1% TOC by weight th the following exc ight TOC and less th by weight TOC and le	end less than 1% to eptions: K011, K013 an 1% by weight TSS as than 1% by weight	otal suspended solids , and K014 wastewaters - less than ; K103 and K104 wastewaters - less t TSS. (40 CFR 268.2(1)(2) and (3))
Comme	ents		
			ed wastes cover constituents that istics? [40 CFR 268.9 (b)]
Yස	No	NA 🗸	
	-	-	nent standards for lab packs?*
Yes	No	NA	
*Use of	the alternative trea	itment standards is i	not required. [55 fR 22629]
If yes, d	lo lab packs only co	ontain the followin	g wastes?" [40 CFR 268.42(c)(2
O ₁	ganometallics: 40 ganics: 40 CFR Pa	Part 268, Appendi rt 268, Appendix \	x IV constituents / constituents
			meet treatment standards may be lab pack. [55 FR 22629]
	ne generator specificachate?	y alternative treati	ment standards for F039 multi-
Yes	No	NA <u>√</u>	
*Use of	the alternative trea	itment standards (s	required. (55 FR 22619)
			identified the treatability group owing wastes? [55 FR 22675]
Liquid	bazardous wastes o	containing PCBs ≥	50 ppm
Yes_	No	na <u>√</u>	
If yes, o	heck the appropri	ate treatability gro	up:
	to 500 ppm PCBs 500 ppm PCBs	•	

	b.	Listed or of (non-liquid content	haracteristic was is) HOCs, which	stes containing > 1,000 mg are not listed or characte	g/I (liquids) or mg/kg crized by the HOC
		Yes 🗸	No	NA	
		If yes, che	ck the appropria	te treatability group:	
		✓ All ot	HOC wastewat per HOCs greate iquids) or mg/kg	er (1,000 mg/l to 10,000 mer than or equal to the pro (non-liquids)	ng/1 HOCs) ohibition level of 1,000
	c.	Liquid baz ≥ 134 mg/	zardous wastes ti i nickel and/or ≥	nat exhibit a characteristic 130 mg/l thallium	and also contain
		Yes	No	NA	
5.	Natio been A.)	nal Capacity identified for	Variance Waste wastes covered	s: Have all applicable Cal under national capacity v	lifornia List prohibitions variances? (See Appendix
	Yes_		No	na 🗸	
	the w	aste codes, h	ontains a mixtur as the generator oblibitions? (See	e of wastes, and a variance identified all applicable to Appendix A.)	e only applies to some of treatment standards and
	Yes_		No	NA	
	comp	lete the follo	orohibitions approving table for e variances expire.	ly to wastestreams manag ach waste code, noting the	ed by the generator, e date on which relevant
	Wast	e Code	Cal List A	pplicability Expiration	on Date
	Com	ments			
6.			rds expressed as	required technologies: H	as the generator specified
u .	an al	ternative me	thod to that requ	pired in 40 CFR 268.42?	as the generator specimes
	Yes.	N	o <u>v</u> N	. .	
	If yes	s, list the was	te code, the tech mentation of ap	nnology specified in 40 CF proval. [40 CFR 268.42()	R 268.42, the alternative b)]
	w	aste Code R	equired Technol	logy Alternative Method	Approval
	-				
	-			_	

	7.	Does the ger	nerator mix restricted wastes with different treatment standards for a of concern?
		Yes 🗸	No
			e generator select the most stringent treatment standards? 3.41(b) and 268.43(b)]
		Yes 🗸	
		Comments	fuel blenoine
B.	Waste	Analysis	, .
	1.		perator determine whether restricted wastes exceed treatment ohibition levels at the point of generation?* [268.7(a)]
		Yes 🗸	No
			determination may be made at the point of disposal if the waste only has a evel in effect.
		If no, does the standards?	ne generator ship all restricted wastes as not meeting treatment
		Yes 🗸	No
		Comments	
	2.	Which of the	following analytical methods does the generator employ?*
		a violation.	answer to applicable questions b. through d. does not necessarily constitute Kowever, knowledge of waste is rarely adequate if a generator certifies that adard criteria have been met.
		a. Know	wledge of waste:
		Yes	No
		If yes	s, list the wastes for which applied knowledge was used and describe pass of determination. Attach documentation. [40 CFR 268.7(a)(5)]
			On site ,
		analy	P°: Are wastes with treatment standards specified in 40 CFR 268.41 yzed using TCLP?** (BDAT*** = stabilization/immobilization nology)
		Yes.	No NA
		era .	* Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, Test Nethod 1311] Appendix C for exceptions. AT = best demonstrated svailable technology. See Appendix A.

	If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]
C.	Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)
	Yes_ No_ NA_
	*See Appendix C for exceptions.
	If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]
ď	PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?
	Yes No NA NA
	*PFLT = Paint filter Liquids Test [Test Method 9095, EPA Publication No. 5W-846]
	If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]
טמט	es the generator treat restricted wastes in 90-day tanks or containers regulated er 40 CFR 262.34 (permissible in some states)?
Yes	
	Blewoin wester the generator treat the waster to meet appropriate treatment dards/prohibition levels?
Yes	No _
If yo test	s, has the generator prepared a waste analysis plan detailing the frequency of ing to be conducted? 40 CFR 268.7(a)(4)]
Yes	No (If No, go to 4.)
Do	s the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]
	Based on a detailed chemical and physical analysis of a representative sample Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

	Has the Express	e plan been filed with the Regional Administrator (return receipt, Federal s slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]
	Yes_	No
	Commo	ents
4.	Dilutio	n Prohibition [40 CFR 268.3]:
	a.	Does the generator mix prohibited* wastes with different treatment standards?
		*See Appendix E for distinction between restricted and prohibited wastes.
		Yes V No (If No, go to b.)
		List the wastes Foo1 -> Foo5
		Are the wastes amenable to the same type of treatment? [55 FR 22666]
		Yes / No
		Comments Incideration - fuel blanding
	ъ.	Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
		Yes No (If No, go to c.)
		Check appropriate category:
		Dilutes to meet treatment standards Dilutes to render waste non-hazardous
		Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]
		Managed in treatment systems regulated under the Clean Water Act Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43
	. *	*Non-taxic = 0001(except high TOC nonwestewaters), 0002, and 0003(except symmides- and sulfides). [35 FR 22666]-
		If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
	C.	Based on an assessment of points a, and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]
		Yes No <u> </u>
		Comments

	5.	consti	Multi-source leachate: Has the generator run an initial analysis for all tuents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]	
		Yස_	NoNA	
C.	Mana	agement		
	1.	On-Si	te Management	
		a.	Are restricted wastes treated (other than in a RCRA exempt unit), sto greater than 90 (small quantity generator - 180) days, or disposed on	ored for site?
			Yes No	
			(If yes, the TSD Checklist must also be completed.)	
			* Small quantity generator * generator of greater than or equal to 100 kg/s less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely haza waste	no. but rdous
			Comments	
		b.	If the generator treats characteristic wastes in systems regulated unde Clean Water Act, have the following been documented: the determinates restriction, how restricted wastes are managed, and why wastes dischar pursuant to an NPDES permit are not prohibited (if applicable)? [55 22662]	nation of rged
			Yes No NA	•
		C.	If the generator treats characteristic wastes in RCRA exempt units to them non-hazardous, are the wastes managed as restricted until 40 Cl 268 treatment standards are met?* [40 CFR 268.9(d)]	render FR Part
			Yes No NA	
			OThis applies to both concentration based treatment standards specified in 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result treatment below the characteristic level. See Appendix D.	40 CFR
	2.	Off-S	ite Management: Waste Exceeds Treatment Standards	
		a.	Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an treatment or storage facility?	off-site
			Yes No (If No, go to 3.)	
			Identify waste code(s) and off-site treatment or storage facilities to www.wastes are shipped.	hich
			Waste Code Receiving Facility HESI 13 (La) CWM (TU)	

		[40 CFR 268.1	7(a)(1)]	notification to the treatment or storage facility?
		Yes <u>√</u>	No	(If No, go to 3.)
		If the generate certification renotification?	or specifies alte equired in 40 Cl	rnative treatment standards for lab packs, is the FR 268.7(a)(7) or (8) included with the
		Yes	No	NA <u>√</u>
	ъ.	_		h waste shipment?
		Yes	No	
		If no, is the wa		tolling agreement pursuant to 262.20(e) (small
		Yes	No	(If No, go to 3.)
		List waste cod tolling agreen	les and subsequence is held.	ent handler with whom a contractual
		Waste Code	Subseque	ent Handler
		-		
		Did the small facility with the CFR 268.7(a)	e first waste shi	ntor provide a notification to the receiving ipment subject to the tolling agreement? [40
		Yes	No	
3.	Off-S	ite Managemen	t: Waste Meets	Treatment Standards
	2.		erator ship wast T-site disposal f	te that meets treatment standards/prohibition acility?
		Yes	No 🗸	(If No, go to 4.)
		Identify waste	code(s) and of	f-site disposal facilities:
		Waste Code		Receiving Facility
				notification and a certification to the disposal (i) and 268.7(a)(2)(ii)]?
		Yes	No	(If No, go to d.)

		Y¤	No			
		If no, is the wa		o a tolling agreen	nent pursuant to 262.20(e) (si	mall
		Yes	No	(If No, go to	c)	
		List waste cod tolling agreem	es and subsector is held.	quent handler wi	th whom a contractual	
		Waste Code		Subsequent I		
		Did the small the receiving i agreement? [4	acility with the	erator provide a r he first waste ship	notification and a certification pment subject to the tolling	a to
		Yes <u>'</u>	No			
	C.			hich have been red to a Subtitle I	rendered non-hazardous (in a D facility?	
		Yes	No	NA	(If No or NA, go to 4.)	
		Complete the	following tal	ole:	•	
		Waste Code		Receiving F	acility	
	٠.				ch shipment sent to the Regio R 268.9(d)(1) and 268.7(b)(5	
		Yes	No			
l.		Off-Site Mana	agement: Wa	stes Subject to V	ariances, Extensions, or Petit	ions
	2.	which are sub	ject to a nation		ent, storage, or disposal facilit iance (40 CFR Part 268, Subp 5)?	
		Yes	No <u>√</u>	(If No, go to	5.)	
		Complete the	following ta	ble:		
		Waste Code	·	Receiving F	acility	

Are a notification and a certification sent with each waste shipment?

b.

ti	he waste is no	rator provide nou	land disposal? [40 CFR 268.7(a)(3)]	[
3	(a	No		
b. I	s a notificatio	n sent with each w	vaste shipment?	
	(ස <u> </u>	No		
		ste subject to a to ill quantity genera	olling agreement pursuant to 40 CFR ator only)?	
3	(a_ ,	No (If No, go to 5.)	
	ist waste code		t handler with whom a contractual	
<u>y</u>	Waste Code	Subsequer		
f.	acility with the 40 CFR 268.7	e first waste shipn (a)(9)]	r provide a notification to the receiving nent subject to the tolling agreement?	
	(a	NO		
	Retention			
relevant	documents fo	r a period of 5 yes	s of all notifications, certifications, and other ars? [40 CFR 268.7(a)(6)]	r
Yes 🗸	No	-	·	
certificat	ion, kept on s nt? [40 CFR	site for at least 3 y 268.9]	nts, along with the LDR notification and/or rears after expiration or termination of the	•
Yes	No	NA 🗸		
	national capac n°?	city variances, case	nagement of wastes previously covered under by case extensions and the soft hammer	Ħ
Yes 🗸	No	NA_		
wastes un	ich had treatm	that the soft harms int standards estab capacity variance	r provision expired as of 05/08/90. Soft hamme: lished in the Third Third rule were granted a to 08/08/90.	r
Commer	nts			

5.

Tre	tment Using R			
1.	Are restricte distillation u	nits, wast	ewater treatment tai	empt units (i.e., boilers, furnaces, nks, elementary neutralization, etc.)?
	Yes	No_y	(If No, do	not complete this section.)
	List types of	waste tre	atment units and pro	ocesses:
	Waste Code		Type of Treatment	Treatment Units and Processes
2				hara units?
_			ils generated from the	iee mie:
	Yes		-	
_	•			
3.		,	_	reater than 90/180 days, or disposed on site
	Yes	No	_ NA	
	_		_	
Add	(If yes, the		clist must also be co	ompleted.) Addressed in the Checklist:
Add	(If yes, the	nts, Conce	clist must also be co	
Add	(If yes, the l	nts, Conce	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:
Add	(If yes, the l	nts, Conc	clist must also be co	Addressed in the Checklist:

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

Yes	No <u>/</u>
If yes, check th	he appropriate regulatory status:
	tatus for storage ermit for storage
(The TSD che	cklist must also be completed.)
If no, describe	inventory controls to ensure that wastes are not stored for more than 10 da
	sporter mix or combine restricted wastes of different DOT shipping [40 CFR 263.10(c)(2)]?
Yes	No V
Al ves the Ga	enerator checklist must also be completed.)
	•
	l wastes treated in RCRA exempt units (boilers, furnaces, distillation unit
wastewater tr	eatment tanks, elementary neutralization, etc.)?
wastewater tr	No (If No, do not complete this section.)
Waste Code	No (If No, do not complete this section.) vaste treatment units and processes:
Waste Code	No (If No, do not complete this section.) vaste treatment units and processes: Type of Treatment Treatment Units or Process t residuals generated from these units?
Waste Code Are treatment Yes	No (If No, do not complete this section.) vaste treatment units and processes: Type of Treatment Treatment Units or Process t residuals generated from these units? No
Wastewater tr Yes List types of w Waste Code Are treatmen Yes Comments	No (If No, do not complete this section.) vaste treatment units and processes: Type of Treatment Treatment Units or Process t residuals generated from these units?
Wastewater tr Yes List types of w Waste Code Are treatment Yes Comments Are residuals	No (If No, do not complete this section.) No (If No, do not complete this section.) vaste treatment units and processes: Type of Treatment Treatment Units or Process

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

1.	Does the waste at [40 CFR 264.13(b	Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]							
	F001-F005 Spent	Solvents	Yes <u>√</u>	No	NA				
	F020-F023 and F	026-F028 Dioxins	Yes	No	na <u>/</u>				
	California List W	්. හැස	Yes 📈	No	NA				
	First, Second, and	Third Third Wast	s Ys <u>√</u>	No	NA				
	Comments								
2.	multi-source l	eachate?							
	Yes N	o_ NA	_						
3.	What date was the waste analysis plan last revised? 2/_/91								
4.	restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]								
	Yes <u>V</u> N	·	·						
	If yes, which of the apply.):	ne following are sou	rces of analytical dat	a? (More than	one may				
	Generator programmer Facility performance Facility contractions								
	CFR 264.13(a)(2) and 265.13(a)(2)]	the facility provide o	orroborative to	esting? [40				
	Yes: N	lo NA_							
	If analyses are co	nducted off site, id	entify lab:						
	using the	toxicity characteris	tandards specified in tic leaching procedu technology) [40 CF]	re (TCLP)?*	(BDAT =				
	92	No	***						

			test, freque		, and note any pr		test results. (40
		b.		constituent an			, 268.43 analyzed (removal technology)
			Yes	No	NA		
			*See Appendi:	x C for excepti	ions.		
			the date of	last test, frequ		and note any pr	was used and provide oblems. Attach test
		C.			test (PFLT) used liquid hazardous		
			Yes	No 🗸	NA		
			test, the fre		ting, and note an		de the date of last tach test results. [40
. B.	Ope	rating Re	cord [40 CF]	R 264.73 and	265.73]		
	1.	specifi			in records and re 40 CFR 268.7(b		nalyses performed as 4.73(b)(3) and
	,	Yes <u>v</u>	_ No				
	2.						and certifications?* (1), (13), and (15)]
		Y s _	No				
		*Includ	se both those i	received from e	penerators, and the	se prepared for	off-site shipments.
	3.	which		wholly on situ	de appropriate de e? [40 CFR 264.		or restricted wastes, and (16) and
		Yes 7	<u> </u>	N	IA		

	managemen	Does the documentation discussed in points 2. and 3. reflect proper historical nanagement of wastes previously covered under expired national capacity variances, ease by case extensions, and the soft hammer provision?*					
	Yes _	No	NA				
	"Note that the treatment stone cape	ne soft hammer p anderds establis acity variance t	rovision expired as of 05/08/90. Soft hammer wastes which had hed in the Third Third rule were granted a minimum 90-day o 08/08/90.				
Stor	age [40 CFR 20	58.50]					
1.	Are prohibi	ted* wastes sto	ored on site in containers?				
	Yes	No	(If No, go to 2)				
	*See Appendi:	x E for distinct	ion between restricted and prohibited wastes.				
		tainers clearly 1 OCFR 268.50(a	marked to identify the contents and date(s) entering a)(2)(i)]				
	Yes 🗸	No					
		s been stored f went into effec	for more than one year since the applicable LDR ct?				
	Yes	No	(If No, go to 2.)				
			such accumulation is necessary to facilitate property sposal? [40 CFR 268.50 (c)]				
	Yes	No					
	If yes, state	how:					
2.	•		red on site in tanks?				
	Yes	No	(If No, go to 3.)				
	hazardous v	waste received, a recorded and	ed with a description of the contents, the quantity of each and date each period of accumulation begins, or is such maintained in the operating record? [40 CFR				
	Yes_V	No					
	Have tanks went into		at least once per year since the applicable LDR regulations				
	Yes	No	(If Yes, go to 3.)				

C.

Yes No If yes, state how: 2. Does the facility store liquid hazardous waste containing PCBs at concentration greater than or equal to 50 ppm? Yes No (If No, go to D.) Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.5 Yes No Have these wastes been stored for more than one year? [40 CFR 268.50(f)] Yes No D. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No full blook of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval in compliance with the subpart D treatment standards for these characteristics (40 CFR 268.42(c)(4)) Yes No NA					osal? [40 CFR	268.50(c)]	nam proper
3. Does the facility store liquid hazardous waste containing PCBs at concentration greater than or equal to 50 ppm? Yes No (If No, go to D.) Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.5 Yes No Have these wastes been stored for more than one year? [40 CFR 268.50(f)] Yes No Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No Fuel bucker List each waste code, the technology specified in 40 CFR 268.42, and the alternatived method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristics (40 CFR 268.42(c)(4))			Yes	No			
greater than or equal to 50 ppm? Yes No (If No, go to D.) Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.5 Yes No Have these wastes been stored for more than one year? [40 CFR 268.50(f)] Yes No D. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No Fuel			If yes, state be	ow:			
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Have these wastes been stored for more than one year? [40 CFR 268.50(f)] Yes No D. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No Fuel bure a no complete this section. Go to E.) List each waste code, the technology specified in 40 CFR 268.42, and the alternative dethod. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 treatment of these characteristics of the characteristic value of the characteristic value of the subpart D treatment standards for these characteristic value CFR 268.42(c)(4)]			Yස	No <u></u>	(If No, go	to D.)	
Have these wastes been stored for more than one year? [40 CFR 268.50(f)] Yes No D. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No fuel bure and complete this section. Go to E.) List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 trin compliance with the subpart D treatment standards for these characteristic v [40 CFR 268.42(c)(4)]			Does the facil	lity meet the I	ISCA criteria i	л 40 CFR 761.65(b)? [40 CFR 268.50(f)]
D. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No full black or NA, go to 3.) List each waste code, the technology specified in 40 CFR 268.42, and the alternmethod. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristics [40 CFR 268.42(c)(4)]			Yes	No			
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1. Does the facility treat restricted wastes other than in surface impoundments? Yes No (If No, do not complete this section. Go to E.) 2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No full black of the laternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approva 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristics [40 CFR 268.42(c)(4)]			Yes	No			
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specified in 40 CFR 268.42? [40 CFR 268.40(b)] Yes No NA (If Yes or NA, go to 3.) Was an alternative method approved? Yes No fuel burner. List each waste code, the technology specified in 40 CFR 268.42, and the alternmethod. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 trin compliance with the subpart D treatment standards for these characteristic [40 CFR 268.42(c)(4)]			Yes 🗸	No	(If No, do	not complete this section	on. Go to E.)
Was an alternative method approved? Yes No fuel black in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restfrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic value (40 CFR 268.42(c)(4))		2.		CFR 268.42	? [40 CFR 268	3.40(b)]	
List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval 3. Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic value [40 CFR 268.42(c)(4)]			Yes	No	NA	(If Yes or NA, go	to 3.)
List each waste code, the technology specified in 40 CFR 268.42, and the alternatived. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval Lab packs: If alternative treatment standards are specified, are incinerator restrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic value [40 CFR 268.42(c)(4)]							
method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)] Waste Code Required Technology Alternative Method Approval Lab packs: If alternative treatment standards are specified, are incinerator restfrom lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic v [40 CFR 268.42(c)(4)]			Yes	No	fuel	لاسه ساط	
3. Lab packs: If alternative treatment standards are specified, are incinerator resulting lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic value [40 CFR 268.42(c)(4)]			method. Che				
from lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic v [40 CFR 268.42(c)(4)]			Waste Code	Required T	echnology A	Itemative Method	Approval
from lab packs containing D004, D005, D006, D007, D008, D010, and D011 to in compliance with the subpart D treatment standards for these characteristic v [40 CFR 268.42(c)(4)]							
Yes No NA		3.	from lab pack in compliance	s containing I with the subj	0004, D005, D	006, D007, D008, D010), and D011 treated
			Yes	No	NA		•

4.	Desc	ribe all other w	raste codes and treatment processes:
	Wast	e Code	Treatment Processes
5.	Char	acteristic waste	\$:
		: 40 CFR Part 2 acteristic level?	268 treatment standard lower than the 40 CFR Part 261
	Yes_	No	
	*This and 26 charac	applies to both \$8.43, and to so steristic level.	concentration based treatment standards specified in 40 CFR 268.41 mm 40 CFR 268.42 required methods which result in treatment below the See Appendix 0.
	treati		ity manage the waste as restricted until 40 CFR Part 268 are met, even after the waste is rendered non-hazardous? [40]
	Yes_	No	
	Com	ments	
6.	Dilut	ion Prohibition	n [40 CFR 268.3]:
	a.	Does the fac	cility mix prohibited wastes with different treatment standards?
		Yes	No (If No, go to c.)
		List the was	ies fuel blenoine
	ъ.	Are the was	tes amenable to the same type of treatment? [55 FR 22666]
		Yes 🗸	No
		If yes, is this	method used for the aggregated wastes?
		Yes 🗸	No
		Comments	burnin a
	c. .	Based on an is dilution w	assessment of points a. and b., or any other relevant information, sed as a substitute for treatment? [40 CFR 268.3(a)]
		Yes	No <u></u>
		Comments	

7.	from all treat	ty, in accordance with an acceptable waste analysis plan, test residues nent processes? [40 CFR 268.7(b)]
	Yes	No 🗸
	Commenu	
8.		ty ship any characteristic wastes which have been rendered non- Subtitle D facility?
	Yes	No (If No, go to 9.)
	Complete the	following table:
	Waste Code	Receiving Facility
		ion and a certification for each shipment sent to the Regional or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]
	Yes	No
9.	Does the faci facility?	ty ship any wastes or treatment residues to an off-site land disposal
	Yes	No (If No. go to 10.)
	Complete the	following table:
	Waste Code	Receiving Facility
		
	Are a notification waste shipme	ion and a certification provided to the land disposal facility with each t? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]
	Yස	No
10.		ty ship any wastes or treatment residues to be further managed at a ment or storage facility?
	Yes 🗸	No (If No, go to E)

Revised 09/90

6

		Complete the following table:
		Waste Code Receiving Facility
		H.E.S. 12 Ins.
		a H.m.
		Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]
		Yes No
E.	Surfac	re Impoundments [40 CFR 268.4]
	1.	Are restricted wastes placed in surface impoundments for treatment?
		Yes No (If No, go to F.)
		List
	2.	Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]
		Yes No
		Comments
	3.	Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]
		Yes No
	4.	If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]
		Yes No NA
	5.	Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]
		Yes No
	6.	Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3)] and 265.73(b)(3)]
		Ys No
		Comments

	standards/pro Sludge Supernatant		No	Waste Code	-
				ted on treatment residues:	_
8.			reatment stand 268.4(a)(2)(ii)	ards/prohibition levels, are the	y removed on
	Yes	No	NA		
	Comments _				
	Are residues 268.4(a)(2)(i		managed in an	other surface impoundment?	[40 CFR
	Y¤	No			
9.				atment standards, is annual th CFR 268.4(a)(2)(ii)]	roughput
	Yes	No	NA		
	Comments_	 			
Len	d Disposal		•		
1.	impoundmen	nts", waste pile		and in units such as landfills, so ent units, salt domes/beds, mine 8.2(c)]	
		No 🗸		C \	
	Yes	No 🔨	(If No, go	to G.)	
			(If No, go		
	*Note: Do not	t include surfac	ce impoundments		
	*Note: Do not	t include surfac	ce impoundments and what waste	addressed in E.	
	*Note: Do not	t include surfac	ce impoundments and what waste	seach unit has received:	
2.	If yes, specify Unit Does the fact wastes prior	y which units a	ance with an a	seach unit has received:	
2	If yes, specify Unit Does the fact wastes prior	y which units a	ance with an a	seach unit has received: ste cceptable waste analysis plan, to all applicable treatment stan	

F.

		es to ensure that they do not exhibit any characteristics; O CFR 268.9(c)]	21
Y¤	No	NA	
	waste May exceed a nt characteristic	characteristic level only if the treatment standard for has been met.	
Does the operformed 265.73(b)(in accordance	i adequately document the results of waste analyses with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and	
Yes	No		
If yes, at w	hat frequency a	re analyses performed?	
Does the	facility land disp	ose of restricted wastes which are not prohibited?	
Y¤	No	(If No, go to 6.)	
List waste	codes in approp	priate category below:	
Case-By-C	Lase Extension (ce (40 CFR Part 268, Subpart C)	
Treatmen	t Standard Varia	CFR 268.6)	
copy of the	e generator not	d contain records of the quantities, date of placement, a ilication [40 CFR 268.7(a)(3)] for each shipment of a case-by case extension or no-migration petition? [40 65.73(b)(10)]	
Yes	No	NA	
		ceiving wastes covered by a national capacity variance of eet the requirements in 40 CFR 268.5(h)(2)?	r
Y=	No	NA	
	lity has a case-by the Regional A	y-case extension, is progress being made as described in administrator?	l
Yes	No	NA	
Are restri	cted wastes plac	ed in underground injection wells?	

G.	Other Wastestreams							
	1.	Does the facility generate wastes other than residues from RCRA treatment units?						
		Yes No (If No, go to H.)						
	2	On-Site Management						
		a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]						
		Yes No NA						
		b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]						
		Yes No NA						
		This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.						
	3.	Off-Site Management: Waste Exceeds Treatment Standards						
		Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?						
		Yes No (If No, go to 4.)						
		Identify wastes code(s) and off-site treatment or storage facilities to which wastes ar shipped.						
		Waste Code Receiving Facility						
		Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]						
		Yes No (If No, go to 4.)						

			ed in 40 CFR 268.7(a)(7) or (8) included with the notification?							
	Y¤_	N	°	NA						
4.	Off-S	Off-Site Management: Wastes Meets Treatment Standards								
	a.		s that meet to sposal facility		/prohibition levels shipped to an					
		Yස	No	(If No, go	to 5.)					
		Identify ŵ	aste code(s)	and off-site disposa	l facilities:					
		Was	te Code	Receiving Facility						
					- - -					
			notifications	and certifications p	provided for each shipment to the and 268.7(a)(2)(ii)]?					
		Yes	No	(If No, go	to b.)					
	ъ.			tes which have been hipped to a Subtitle	rendered non-hazardous (in a D facility?					
		Yes	No_	NA	(If No or NA, go to 5.)					
		Complete	the followin	g table:						
		Was	te Code	Receiving Facility						
					-					
	. •	Are a noti Administr	ification and ator or author	a certification for e orized State? [40 C	- ach shipment sent to the Regional FR 268.9(d)(1) amd 268.7(b)(5)?	•				
		Yes	No							

5.	Off-S	ite Managemen	it: Wastes	Subjec	t to Variances, Extensions, or Petitions
	•		r a case-b	y-case (a national capacity variance (40 CFR Part 268, extension (40 CFR 268.5) shipped to a l facility?
		Y¤	No	•	(If No, go to 6.)
		Complete the	e followin	g table:	
		Waste (Code	Recei	ing Facility
		<u>```</u>	-		
	b.		vided for		ig that the waste is not prohibited from land ipment to the off-site receiving facility? [40]
		Y¤	No	-	•
6.	Diluti	ion Prohibition	[40 CFR	268.3]:	
	a.	Are prohibite	ed* waste	s with d	lifferent treatment standards mixed?
		*See Appendix	E for dist	inction	between restricted and prohibited wastes.
		Yes	No	-	(If No, go to b.)
		List the wast	ట		
		Are the wast	es amena	ble to t	he same type of treatment? [55 FR 22666]
		Yes	No	-	
		Comments_			
	ъ.				to meet treatment standard criteria, or render 22665-22666
		Yes	No	_	(If No, go to c.)
		Check appro	priate cat	tegory:	
		Dilutes to			standards on-hazardous

Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43 "Non-toxic = 0001 (except high 700 normastemeters), 0002, and 0003 (except of end sulfides). (55 FR 22466) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.	c. E	Treatment standard specified in 40 CFR 268.41 or 268.43 for-taxic = 0001 (except high 100 non-sastewaters), 0002, and 0003 (except end outfides). ISS FR 22446) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. Cased on an assessment of points a. and b., and any other relevant incumstances, are prohibited wastes diluted as a substitute for adequative eatment? [40 CFR 268.3(a)] Tes No Comments ments, Concerns, or Issues Not Addressed in the Checklist:
Theretexic = 0001 (except high 100 non-assessment), 0002, and 0003 (except cond outfides). [55 FR 22446) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. C. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments Additional Comments, Concerns, or Issues Not Addressed in the Checklist:	c. E	ton-taxic = 0001 (except high for normastemeters), 0002, and 0003 (except of sulfides). (35 FR 22444) If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted. It is a seed on an assessment of points a. and b., and any other relevant incumstances, are prohibited wastes diluted as a substitute for adequate reatment? [40 CFR 268.3(a)] It is a substitute for adequate reatment? [40 CFR 268.3(a)] It is a substitute for adequate reatment.
c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 268.3(a)] Yes No Comments Additional Comments, Concerns, or Issues Not Addressed in the Checklist:	c. E	sased on an assessment of points a. and b., and any other relevant ircumstances, are prohibited wastes diluted as a substitute for adequate reatment? [40 CFR 268.3(a)] Yes No Comments ments, Concerns, or Issues Not Addressed in the Checklist:
c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 268.3(a)] Yes No Comments Additional Comments, Concerns, or Issues Not Addressed in the Checklist:	ditional Com	cased on an assessment of points a. and b., and any other relevant ircumstances, are prohibited wastes diluted as a substitute for adequate reatment? [40 CFR 268.3(a)] [cs No Comments ments, Concerns, or Issues Not Addressed in the Checklist:
circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)] Yes No Comments Additional Comments, Concerns, or Issues Not Addressed in the Checklist:	ditional Com	ircumstances, are prohibited wastes diluted as a substitute for adequate reatment? [40 CFR 268.3(a)] [es No Comments ments, Concerns, or Issues Not Addressed in the Checklist:
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Additional Comments, Concerns, or Issues Not Addressed in the Checklist:	iitional Com	ments, Concerns, or Issues Not Addressed in the Checklist:

Illnois Environmental Protection Agency RCRA INSPECTION REPORT Division of Land Pollution Control IEPA #: _O USEPA #: Phone #: Facility Name: invironmental Services Street Address: County: City: State: Lemont IL Region: Inspection Date: From: 8:30gm Ta: Weather: TYPE OF FACILITY Regulated As: Notified As: T. TSO WAF OSF, SOF T. S.-WAF OSF SOF 90-Day F/U Required?: (You or black TYPE OF INSPECTION CEI: Sampling: Citizen Complaint: Other: Closed: CME/C&M: _ Record Review: Follow-Up to inspection of: Withdrawai: NON-REGULATED STATUS NA SQG: Claimed Nonhandler: Other (Specify in Narrative): PART A 2 / 19 / 30 , from (initial) or (subsequent) Notification. Notification Date: initial Part A Date: Amended: 1118138 Approved by (US)(IL) EPA: Part A Withdrawai requested: PART B PERMIT APPLICATION 11 10 188 Part B Permit Submitted: Y or N Final Permit Issued: ENFORCEMENT Has the firm been referred to -USEPA: (Y) or N Illinois Attorney General: Y or (N) County State's Attorney: Y or (N) ORDERS ISSUED CACO: 1 35 CAFO: 126185 Consent Decree: Federal Court Order: State Court Order: **IPCB Order:** TSD FACILITY ACTIVITY SUMMARY Nothing Conducted Bairio dore al Trie of Way? PHO D 19801 Was Activity EN Dorei On Annual Report Exempt per Activity by 19 88 19 87 Process Code 35 IAC. Sec. ? 501 No No res نعه Tes 25 7 No Yes うこて No كعآ je s No 7 Yes Yes No No TOI 125 'e5 **Yes** N/A 7 Yes Yes T04 No N No Yes Tes

L 522-1834

SUMMARY OF APPARENT VIOLATIONS

OWNER	OF	PERATOR
Name Metrodian inter Reclamation Address 100 E Erie St	Address (and	Environmental Servicer I
	City /	Jan Jane J. W.C.
State IL Zip Loci	State =L	Zip 60439
Phone # 312/675-8099	Phone # 703/	1739-1150
PERSON(S) INTERVIEWED	TITLE	PHONE #
30b Gareia	Plant Mana	ger 708/739-1150
		F
INSPECTION PARTICIPANT(S) AGENCY/TIT	TLE PHONE #
John Maker	I E PA/EPS	708/345-9780
PREPARED BY	AGENCY/TI	TLE PHONE #
isha Maher	JEPA/ERS	768/345-5780
	od Class Section	Priest Ciass Section
ther 1 725.294 02 2 728,150 (a)(2)		
	1 1	

NARRATIVE

INTRODUCTION

hazardous waste. At this location (Canal Bank Road, Lemont), there are four divisions (or units): the treatment plant, which is the subject of this inspection; HES transportation; Remediation Engineering, which will be leaving this location in November, 1990; and Petroleum Management, which is a new division for this location. The treatment plant stores and treats hazardous and non-hazardous waste from off-site. HES transportation services the transportation needs for HES and HES customers. Remediation Engineering responds to emergencies and performs site clean-ups. Petroleum Management utilizes a multi-stop permit to pick up waste oil from customers such as Jiffy Lube.

TREATMENT PLANT ACTIVITIES

TES reclaims/reuses waste oil and hazardous waste mixtures. Hazardous aste fuel (subject to Part 726) is produced from waste oil and ignitable nazardous waste by separating phases within wastes and mixing the various waste streams. They also produce on-spec waste oil fuel by using heat and chemical separation of waste oil and contaminants, such as water.

One of HES's other activities includes providing temporary container storage of hazardous waste for the Drug Enforcement Administration (DEA). (The containers are placed in the semitrailers until the wastes are sent for incineration off site.) HES also provides temporary storage for lab packs until they are sent off site (usually for incineration). (HES is planning on getting permitted to remove the contents of the lab packs they receive so they can incorporate some the materials into the hazardous waste fuel program.)

HAZARDOUS WASTES GENERATED

Hazardous Waste Fuel F001-F005

- A mixture of the ignitable hazardous waste and non-hazardous waste oil received from off site.
- Sent to cement kilns (Systech in Indiana and Continental Cement in Missouri).

Used Oil & Oil/water Mixtures DOOS 17 111:T 1990 - Waste oil that exhibite the

- Waste oil that exhibits the characteristic of EP Toxicity for lead and is brought on site, but which the site has not able to treat. It typically does not exhibit this characteristic.
- Sent to HES in Indianapolis for treatment.

Waste Petroleum Naphtha D008

- Generated from a parts degreaser is owned and serviced by Safety-Kleen.
- Reclaimed by Safety-Kleen in Mokena, Illinois.

Heritage Environmental Services 0311620007 08/90

Waste Flammable Solids D001, F001-F005

- Spill pads and contaminated soil from Remediation Engineering's off-site activities.
- Incinerated at OHM in Georgia.

Flammable Solids D001, F001-F005

- Strainer cleanings from secondary fuel blending process.
- Incinerated at OHM in Georgia.

Lab Packs

- Received from off site clean-up projects, such as school chemistry lab
- Never opened by HES. Sent for incineration at HES in Indianapolis or at TWI in Illinois.

<u>lsted Hazardous Water</u>

- Bulking of off-site drums of hazardous waste water.
- Sent for incineration at Rollins in Baton Rouge, LA.

Figure Received but Treated Elsewhere

- waste received for temporary storage (e.g., DEA waste) and sent off site for disposal.
- Sent to HES in Indianapolis for incineration.

NON-HAZARDOUS WASTES GENERATED

Solids

- Non-hazardous tank bottoms, ERU soils from clean-ups, cut up plastic drums, etc.
- Sent to CID Landfill in Chicago.

Waste Oil

- Non-hazardous loads of waste oil that are too difficult to separate at this location. (As a result of this site's recent use of chemical separation of waste oil, this waste stream is rarely generated.)
- Sent to HES in Indianapolis for further treatment.

Treatment Water

- Reaction water from the phase separation of waste oil and water. (As a result of this site's recent use of chemical separation of waste oil, the volume of this waste stream generated has increased many fold.)
- Sent to HES in Indianapolis for treatment.

Crushed Drums

- RCRA empty metal containers that are crushed in a hydraulic compacter.
- Sent to US Steel (USX) for use in their furnaces to recover the steel. (Since it is handled as scrap metal, its holonger handled as special waste.)

Weritage Environmental Services 511620007 52390

EGULATED HAZARDOUS WASTE UNITS

Container Storage (S01)

Containers are stored on a diked, concrete pad and in several locked semitrailers. Incompatibles are stored on opposite ends of the concrete pad.

Tank Storage (S02)

Storage tanks are situated on a concrete pad with concrete secondary containment. (NOTE: the secondary containment is not in compliance with 725.293, but compliance will not be required until 1995.) The tank farm includes initial receiving tanks (VRT 1 through VRT 4), cone bottom gravity separation tanks (CB-1 through CB-4) and product storage tanks (SF-1 through SF-6 and OS-2).

Treatment in Tanks (T01)

Heat treatment occurs in HT-1 through HT4. Waste is heated, which facilitates oil/water separation. They also use chemical separation.

Treatment in Containers (T04)

Treatment in containers is not occurring at this time.

MOTE: A CAFO was issued on 9/26/85. Per previous inspector's reference of another inspector's observations, HES is in compliance with the CAFO.

APPARENT VIOLATIONS

At the time of the inspection, the following apparent violation was abserved:

725.294 - Level sensing devices were not installed on tanks storing hazardous waste.

128.150(0/2) - CONTAINERS OF HARARBOUS WASTE WERE NOT MARKED WITH THE



USEPA #: IL D & £ 5 3 4 9 2 6 4

WASTE DISPOSITION FORM

IEPA #: <u>C 3</u>	1 4 6	2 0	<u> </u>	7						FUI				
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Hazardous Weste Fuel		Jarrative	1	11 001	Yes	Yes	G F	G F	G /	71,000 gal	50,000 per month	9-26-90		Narrative
used oil \$ oil/water mixtures			7-31-90	D008			G F	G F	G F	None	Irregular	7-31-90		
Waste Petroleum Naptha			ИДА	0001			G F	G F	G F	None	15 gal per muth	8-27-90		
waste flanable Solids			No cenalysis	DOE! FUEL FUELS			G F		G F	اهن طرسه	50,000 per	4 44-90		
Flamable solids		(No analysis	V			G F	G F	G F	15 drums	(combines)	1		
hab Packs			No analysis - Inventor Sheets	لتضالا	,		GF	G F	G F	16,000 yal	20,000 1200 year	8-17-90		
histed Hazardon			No aredysis (Finger pinat)	1 1			G F	G F	G F	10,000 Sol	to over	9-6-90		
Waste received but treated Elecuhene	`		8-8-7.		\downarrow	Ų.	G /	<u> </u>	G	69	25,000 gel per	9-7-40		
							G F	/	G F					
							G F	G F	G F	,				

^{*} All "NO" responses must be explained in narrative.

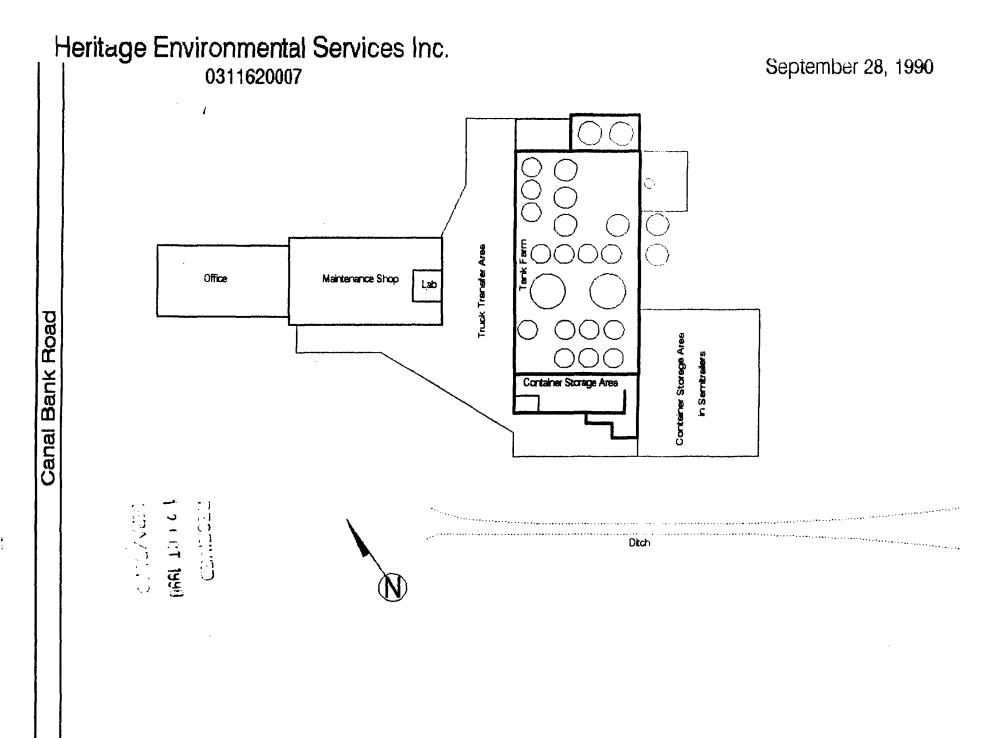
USEPA #: IL D 0 8 5 3 4 9 2 6 9

WASTE DISPOSITION FORM

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Solids	See Navatue	A) a analysis	N/A	N/A	NA	ig i z	$\left\{ \mathbf{G} \right\}$		F 227	20 c.y. per quarter	7-31-90	1
Waste oil		8-30-90				G	G	G F	None	rare	8-390	
Treatment Water		9-26-90				G	G	G F	H Gal	Recently increased Rate waknow	9-24-9.	1
Crushed Druns	\bigvee	N :0 CYPEU 75.3	V	↓	J	G	G	G V		ondled as	Not monifest	Scrap metal. (rectioned) USX in
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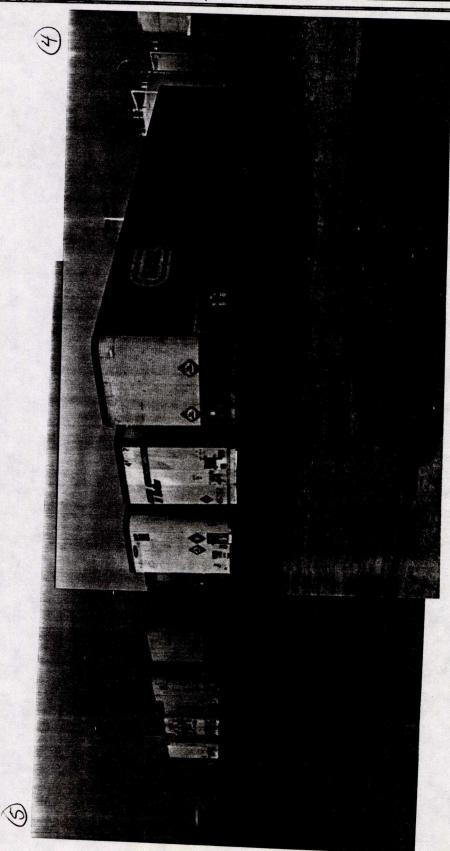
^{*} All "NO" responses must be explained in narrative.

IL 532-1836 I PC - 336 (12/89) Page 2



Site Name: Heritage Environmental Services Inc. 110 8: 031/620007

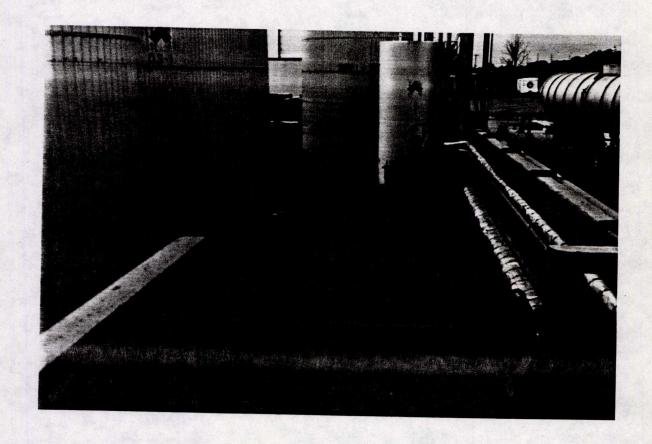
Date: 9-28-90 Time: 8:30An-1:00pm Photograph By: John Maker



comments: Container Storage Area within Semiterilors

Roll 8: 91-72 Photo 8: 4 \$5

Date: 9-28-90 Time: 8:30An-1:00pm Photograph By: John Maher



comments: Tank Farm

Illinois Environmental Protection Agency Photographs Date: 9-78-90 Time: 8:30An-1:00pm Photograph By: John Maker TECENED 1 2 0 CT 13 3 1 IEPA/DATO comments: Tank Farm; showing there is no wating on the secondary

Containment Roll #: 91-72 Photo #: 1 \$ 2

Date: 9-28-90 Time: 8:30An-1:00pm Photograph By: John Maker



Comments: Container Storage Area

Roll 8: 91-72 Photo 8:647

site Name: Heritage Environmental Services Inc. site :: 03/1620007

Date: 9-23-90 Time: 8:30 Am - 1:00pm Photograph By: John Maher



comments: Containers within Semitoriler

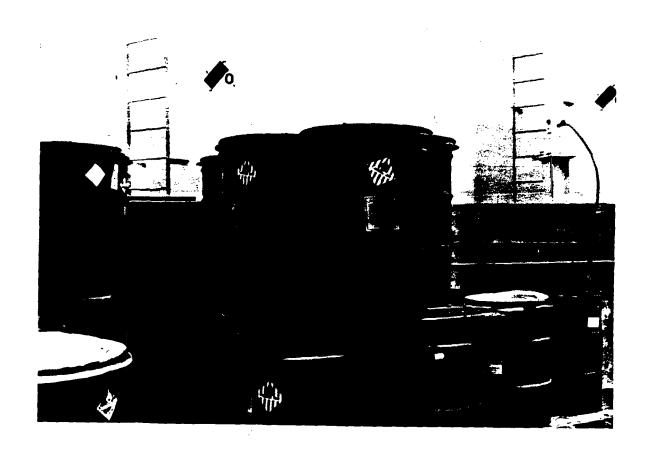
__ Roll #: 91-7/ Photo #: 8



comments: Continers within Semitrailer

Roll #: 91-71 Photo #: 9

Date: 9-28-90 Time: 8:30An-1:00pm Photograph By: John Maker



Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent bliance? No	Not Applicable	Remarks or Comment No.
отн	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes X No	X			
ОТН	1			Did the generator follow the procedures specified in this section in making its determination? Yes X No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number? Yes X No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes X No No No	۲_			
								j

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		perent liance? No	Not Applicable	Remarks or Comment No.
MAN	2		b	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check No in the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No 13	X			

8	184	90 Day	Key Ltr			parent liance?	plicable	Domestic on Comment No.
Area	Class	F/U Req	Sub Sec	Requirement .	Ye ş	No	Not Ap	Remarks or Comment No.
MAN	2			Section 722.121: Acquisition of Manifests	X			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes NO N/A				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?				
				or				
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A				
MAN	2			Section 722.122: Number of Copies	X		- }	
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			Section 722.123: Use of the Manifest	<u>X</u>		-	
			Ì	For each manifest received, has the generator:				
				1) Signed the certificate by hand? Yes No				
				2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ≼ No				r
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				en la production de la company de la company de la company de la company de la company de la company de la comp La company de la company d	, 	6.00		and the same of th
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	r. Requ ireme nt		pparent pliance? No	Not Applicabl	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes \(\subseteq \) No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes \(\subseteq \) No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest \(\subseteq \). Has the generator apparently given the remaining copies of the manifest to the transporter? Yes \(\subseteq \) No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes \(\subseteq \) No \(\subseteq \) N/A \(\subseteq \) Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes \(\subseteq \subseteq \) No \(\subseteq \) N/A \(\subseteq \)				

				6.	 -			
	Class	90 Day	Key Ltr		In Ap	parent pliance?	Q Cap	
Arm	3	F/U Req	Sub Sec	Requirement	1	No	ot Ap	Remarks or Comment No.
ОТН	1	x		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site			X	Not realy for transportation.
ОТН	1	x		packaged in accordance with 49 CFR, Parts 173, 178 and 179? Section 722.131: Labeling			Y	
0		^		Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
отн	1	х		Section 722.132: Marking			8	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with:				
				- The generator's name and address? Yes No				
				- The manifest document number associated with the container? Yes No				
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No				

<u></u>		<u></u>						
Ares	Ciess	90 Day F/U	Key Ltr Sub	Requirement		operent oliance?	Applicable	Remarks or Comment No.
1		Req	Sec		Yaş	No	ş	
отн	1			Section 722.133: Placarding	X			
				Does the generator have, for the waste it generates, the proper placards to:				
				- Placard the transport vehicle, or		}		
				 Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? 				
				NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.				
нто	1	X		Section 722.134: Accumulation Time	=			> See Page
				NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.				GEN-C-2(a)
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below:				<u>.</u>
				NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				
								r
						į		

Aree	Ciaes	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	perent pliance? No		Remarks or Comment No.
OTH	1		a1	Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? and/or For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes No No No N/A For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes No No N/A For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes No No	1		Not A	No waste accumulate In tanks.
								r

					1			1 1 1 1 1 Exp.
Arse	Clees	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	perent lience?	tot Applicable	Remarks or Comment No.
				Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes No N/A - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes No 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes No 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes No - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes No				N/A-No Satellite accumulation

	 -			gradien der Gradien der State der Gradien	3.73	artist 1		A CONTRACT OF THE PARTY OF THE
Aree	Cleas	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	perent lience? No	Not Applicable	Remarks or Comment No.
				Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 III. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes No Are the containers with the excess amounts marked with the date accumulation began? Yes No During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes No				

•	2	90	Key	•		perent	Cabble	, et . es t
Aree	Class	Day F/U Req	Sub Sec	Requirement .	Yes	No No	Not App	Remarks or Comment No.
отн	2		a b c d	PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years: - A copy of each signed manifest? Yes No - A copy of each annual report? Yes No - A copy of each exception report? Yes No - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A If the Director has requested that the records required	X	No	Not	
				in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes No N/A				,

<u> </u>				· 大学的一种一种的一种的一种一种一种一种一种一种一种一种一种一种一种一种一种一种一种		ACT IN THE		A STATE OF THE STA
Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent lience? No	Not Applicable	機能 Ne 特殊性 いっぱってない (大) Remarks or Comment No.
отн	2			Section 722.141: Annual Reporting	<i>X</i> .			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			Section 722.142: Exception Reporting			\times	
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No				·
			b	Does any exception report submitted to the Director contain the following:				
				 A legible copy of the manifest for which the generator does not have confirmation of delivery; and 				1

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	:	90 Day	Key Ltr	ne de la companya de la companya de la companya de la companya de la companya de la companya de la companya de	ln Ar	perent	. ₹	
Ares	5	F/U Req	Sub	Requirement		olience?	<	Remarks or Comment No.
 -	 		Sec		Yes	No	2	
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A				
OTH	1			Section 722.143: Additional Reporting	<u> </u>	ļ		
				Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				·
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C C C	90 Day F/U Req	Sub	Requirement	Comp	perent lience? No	Not Applicable	Remarks or Comment No.
OTH 1/2			PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.			X	

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Ares	1	90 Day	Key Ltr	Requirement		perent pliance?	a dica di	. 4,4
₹	បី	F/U Req	Sub Sec		Yeş	No	ot Ap	Remarks or Comment No.
MAN	1		b 1	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that:			X	
	1 2 OCT 1850		b2	In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and Has the importer or his agent signed the manifest in place of the generator; and Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A Is the person importing hazardous waste using manifests obtained from the Agency? Yes No				

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Aree	Cleas	90 Day F/U Req	Key Ltr Sub Sec	Requirement Compliance? Yes No §
ОТН	2	X		PART 722 GENERATOR STANDARDS Subpart 6: Farmers Section 722.170: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Maste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A MOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).

SE SE PO Day F/L Rec	Sut	-	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
OTH 1	a	RCRA Subp Sect Has or date the perm the	RT 703 RA PERMIT PROGRAM Opart C: Authorization by Rule and Interim Status Station 703.150: Application by Existing HMM Facilities and Interim Status Qualifications Status the owner or operator of an existing HMM facility of a HWM facility in existence on the effective te of statutory or regulatory amendments that render effective te of statutory or regulatory amendments that render effective te of statutory or regulatory amendments that render to a Agency no later than the following times, whichever ness first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 III. Adm. Code 725? Yes No N/A 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 III. Adm. Code 725? Yes No N/A 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A N/A	X			

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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance?		Re	ernarks or	Commen	t No.
ОТН	1			Section 703.151: Application by New HMM Facilities			Ž	Not	ar	ور ،	facility.
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes No Is the facility only operating with a RCRA permit?							·
				Yes No No NoTE: This violation should be cited in the CIL only after receiving approval from headquarters.							
ОТН	1			Section 703.152: Amended Part A Application	入						
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:							
				1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes No N/A							
				2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A							
				NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.					ı		

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Area	Class	90 Day F/U	Key Ltr	". Requirement		parent liance? (pplicable	Remarks or Comment No.
	J	Req	Sub Sec		Yeş	No	Not A	
ОТН	.1			Section 703.154: Prohibitions During Interim Status	X			
				During interim status, has the facility refrained from:				
			a	 Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes \(\sum_{} \) No 				
			b	 Employing processes not specified in Part A of the permit application? Yes No 				•
			С	 Exceeding the design capacities specified in Part A of the permit application? Yes No 				
ОТН	1			Section 703.155: Changes During Interim Status	X			
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				·
			đ	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes No N/A				,

2	90 Day	Key Ltr	Requirement	In Ap	perent	pplicable	Remarks or Comment No.
๋	F/U Req	Sub Sec	rioquii ornorit		No	Not A	
1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability			X	
			Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No				
			NOTE: If "Yes", explain in narrative.				·
		d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes No \(\begin{subarray}{c} \beta \end{subarray} \end{subarray} \(\beta \end{subarray} \)				
	Class	Day D F/U Req	Day F/U Sub Sec	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)?	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No NOTE: If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)?

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		pperent bliance?	lot Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards			ų,	
ОТН	1			Section 725.111: USEPA Identification Number	X			
]			Has the facility obtained a USEPA identification number?				
ОТН	1	j		Section 725.112: Required Notices	×			
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				
OTH			•	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A	X			
ОТН	1		}	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No				ſ

	2	90	Key Ltr	6		parent	licable	
Area	Clar	Day F/U Req	Sub Sec	Requirement .	Comp Yes	No No	Not App	Remarks or Comment No.
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes \(\sum \) No				Finger print analysis.
				Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the				Every shipment is finger print analyzed.
			b	identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A Has the owner or operator developed a written analysis plan? Yes No No NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes No				,

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	in Ap Comp	parent diance?	Vot Applicable	Remarks or Comment No.
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No				
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes No				
				2) The test methods which will be used to test for those parameters? Yes No				
				The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				
				The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No				1
								1

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yes	perent liance? No	Not Applicable	Remarks or Comment No.
				6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in , Sections:				
				- 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes \(\sum \) No \(\sum \) N/A				
			с	NOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan:				
				Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A				
				2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes No N/A				
OTH.	1	X		Section 725.114: Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes No	X			,

| Remarks or Comme Requirement Remarks or Comme |
|--|---------|
| Req Sec Yes No 3 Does a non-exempt facility have either: | ant Na |
| | ent No. |
| monitors and controls entry into the active portion of the facility? Yes No OR b | |

Area	Ciass	90 Day F/U	Key Ltr Sub	Réquirement .	In Ap Comp	parent liance?	Applicable	Remarks or Comment No.
		Req	Sec		Yeş	No	Z Z	
ОТН	2			Section 725.115: General Inspection Requirements	X.			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes No				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No				
			b2	Is the written schedule at the facility? Yes 🔀 No				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes \times No				
			ь4	Does the schedule specify at least the following minimum inspection frequency:				
				Daily inspections of areas subject to spills? Yes No				
	}							,

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent fiance? No	Not Applicable	Remarks or Comment No.
			c d d	- The items and frequencies, where applicable, called for in Sections: -			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
HTO	Clas	F/Ú	al .	Pequirement - A notation of the observations made? Yes No - The date and nature of any type of corrective action? Yes No N/A Section 725.116: Personnel Training Does the facility have a training program? Yes No No NOTE: If "No", skip to Section 725.117, Page TSD-B-10. Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No No Is the training program formalized, i.e., written down? Yes No No Does the program cover, at a minimum:	1	Not App	Remarks or Comment No.
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes\(\frac{\lambda}{\lambda}\) No N/A			r

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	oparent oliance? No	Not Applicable	Remarks or Comment No.
Are	Clas	F/U	b C	B) Key parameters for automatic waste feed cutoff systems? Yes No N/A C) Communications or alarm systems? Yes No N/A D) Response to fire or explosion? Yes No N/A E) Response to ground water contamination incidents? Yes No N/A Does the program cover the implementation of the contingency plan? Yes No NA Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A Has the facility conducted an annual review of the initial training? Yes No N/A Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No No No No No No No No No No No No No		Not App	Remarks or Comment No.

Area	Ciass	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No				•
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No				
			е	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes No N/A				
отн	1	X		Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	X			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes X No				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes No				,

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	Not Applicable	Remarks or Comment No.
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes \(\sum_{=}^{\text{No}} \) No				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No				
·				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No				
				4) Damage the structural integrity of the device or facility containing the waste? Yes No				
				5) Through other like means threaten human health or the environment? Yes <u>X</u> No				·
								, ,

Area	Class	90 Day F/U Req	Key Ltr Sub Sec		In Ap Comp	perent liance? No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A NOTE: A "Yes" answer is a violation of the location standard.			<u> </u>	
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Area	Class	90 Day F/U	Key Ltr Sub			operent oliance?	Applicable	Remarks or Comment No.
		Req	Sec		Yes	No	Not	
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				
отн	1	Х		Section 725.131: Maintenance and Operation of Facility	1			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
				Air;Soil; orSurface water,				
				which would threaten human health or the environment? Yes No				
отн	1	х		Section 725.132: Required Equipment	X			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A				
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No N/A				1

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No N/A	X		•	

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3	3	90 Day	Key Ltr	••		perent diance?	plicab	(Art)
Ara	5	F/U Req	Sub	Requirement			t Ap	Remarks or Comment No.
		,,ed	Sec		Yeş	No	2	
ОТН	1	X		Section 725.134: Access to Communications or Alarm Systems	X			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				·
			ь	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes No N/A				
ОТН	1	х		Section 725.135: Required Aisle Space	X			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
ОТН	2			Section 725.137: Arrangements with Local Authorities	X _			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				
								•

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes \(\sum \) No \(\) N/A \(\)			
			=	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A			Only one will instially respond.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A			They are a an ER contractor.
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes No N/A			·
				NOTE: Any "N/A" answer must be explained in the Comments.			
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes No N/A			r

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
ОТН	1			Section 725.151: Purpose and Implementation of Con- tingency Plan	X			
			a	Is a plan available? Yes 📐 No				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A				
ОТН	2			Section 725.152: Content of Contingency Plan	X			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:			i	
				1) Fires? Yes No No No No No No No No No No No No No				
								, ·

Ares	Cless	90 Day F/U Req	Key Ltr Sub Sec	r. Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No No			
			С	Does the plan describe the arrangements agreed to by:			
				<pre>1) Local police and fire departments? Yes No</pre>			
				2) Hospitals? Yes 🗻 No			
				3) Contractors? Yes 🟃 No			
				4) State and local emergency response teams? Yes No			
			d	Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes No			
			d	Is the list of emergency coordinators up-to-date? Yes No			•
			đ	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes No			
			е	Does the plan identify:		ı	
				1) A list and physical description of all emergency equipment at the facility? Yes No			

Ansa	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance? No	Not Applicable	Remarks or Comment No.
				2) A brief outline of the capability of each piece of emergency equipment? Yes No				
				3) The location of each piece of emergency equipment? Yes No				·
			е	Is the list of emergency equipment up-to-date? Yes No				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes NO N/A				
			f	Does the plan identify the signal to be used to begin evacuation? Yes No				
			f	Are alternate evacuation routes identified? Yes No				
ОТН	2			Section 725.153: Copies of Contingency Plan	X			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes No				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes No				,
				15h_6_ 7				

Aras	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		operent oliance? No	Not Applicable	Remarks or Comment No.
ОТН	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever:	X		,	
			a b	 Applicable regulations are revised? Yes				·
			С	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				·
			đ	4) The list of emergency coordinators changes? Yes No				
ОТН	2		е	5) The list of emergency equipment changes? Yes No Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No	×			
								r

Area	Cleas	90 Day F/U Req	Key Ltr Sub Sec	Requirement		in Ap Comp	parent liance?	ot Applicable	Remarks or Comment No.
ОТН	1/2			Is there an emergency coordinator familiar with al aspects of the contingency plan, all operations an activities at the facility, the location and character istics of the wastes handled, the location of all record in the facility and the facility layout? Yes No Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes No Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes No NOTE: If the answer is "Yes", explain in detail the procedures described in this section. Review the procedures described in this section. If the company failed to meet one or more of the requirements while completing the explanation. If the company failed to meet one or more of the requirements check "No" in the Apparent Compliance column.	id - ls le ie	X		2	9-1-88. Shredder exploded. See 3-89 inspection report.

Area	Class	90 Day F/U Req	Key .Ltr Sub Sec	Requirement		perent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting				
MAN	1			Section 725.171: Use of Manifest System	太			
: :	:			Does the facility accept waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes No N/A				•
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				1

Area	Class	90 Day F/U	Key Ltr Sub		Comp	perent liance?	t Applicable	Remarks or Comment No.
MAN	2	Req	b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes No N/A Does the facility initiate shipments of hazardous waste? Yes No NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist. Section 725.172: Manifest Discrepancies NOTE: If there are no manifest discrepancies, mark the "N/A" column. Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes No If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No	Yeş	No	Not A	Unaceptable shipments are rejected.
	ŀ	ŀ		•				

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Aree	Ciess	90 Day F/U Req	Key Ltr Sub	Requirement	j	Hance?	t Applicable	Remarks or Comment No.
			Sec		Yeş	No	2	
нто	2			Section 725.173: Operating Record	X			
			a	Does the owner or operator have a written operating record at the facility? Yes No				·
			b	Is the information in the operating record being main- tained until closure of the facility? Yes No				•
			b	Does the operating record contain the following information:				
				 A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No 		,		
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes No				·
				3) The location of each hazardous waste within the facility? Yes No				
				4) The quantity of each hazardous waste at each location within the facility? Yes No				
				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A X				ı
				162 NO N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	operent oliance?	ot Applicable	Remarks or Comment No.
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes No N/A 7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes No N/A - 725.293 (Tanks)? Yes No N/A - 725.325 (Surface Improvements)? Yes No N/A - 725.352 (Waste Piles)? Yes No N/A - 725.373 (Land Treatment)? Yes No N/A - 725.441 (Incinerators)? Yes No N/A - 725.475 (Thermal Treatment)? Yes No N/A - 725.502 (Chem., Phys., Bio. Treatment)? Yes No N/A 8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes No N/A	No	Ž	

Area	Class	90 Day F/U Req	Key Ltr Sub Sec		Requirement .	perent bliance? No	Not Applicable	Remarks or Comment No.
				9)	Records and results of inspections as required by Section 725.115(d)? Yes No			
					NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.			•
				10)	Monitoring, testing or analytical data where required by Sections:			
					- 725.190 (G.W. Monitoring)? Yes No N/A			
					- 725.194 (G.W. Monitoring)? Yes No N/A —			
					- 725.376 (Land Treatment)? Yes No N/A _>_			
					- 725.378 (Land Treatment)? Yes No N/A _>			
					- 735.380(d)(1) (Land Treatment)? Yes No N/A			
					- 725.447 (Incinerators)? Yes No N/A			
					- 725.477 (Thermal Treatment)? Yes No N/A			
					NOTE: Data required under 725.194 must be kept throughout the post-closure period.			f

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		pparent pliance? No	Not Applicable	Remarks or Comment No.
ОТН	2	Req	a C	11) All closure cost estimates required by Section 725.242? Yes \(\sum \) No \(\sum \) N/A \(\sum \) 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes \(\sum \) No \(\sum \) N/A \(\sum \) Section 725.174: Availability, Retention and Disposition of Records During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes \(\sum \) NO \(\sum \) N/A \(\sum \) Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes \(\sum \) No \(\sum \) N/A \(\sum \) - The local land authority? Yes \(\sum \) No \(\sum \) N/A \(\sum \) Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes \(\sum \) N/A \(\sum \)	Yeş	No	Not	
								1

Are	\$ C	90 Day	Key Ltr	Requirement		perent Hance?	pplicable	Remarks or Comment No.
*	0	F/U Req	Sub Sec		Yeş	No	Not A	
ОТН	2			Section 725.175: Annual Report	X			
		!		Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?		; ; ;		
нто	1			Section 725.176: Unmanifested Waste Report			X	
				Does the facility accept hazardous waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				·
,				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 III. Adm. Code 721.105? Yes No \(\alpha \sum \bigceps \)				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:			·	
			- 1	Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No ///				
				·				, ·

				The state of the s	-			(2) (2) (2) (2) (2) (2) (2) (2) (2) (2)
Aree	Class	90 Day	Key Ltr	Requirement	In Ap	parent liance?	pplicabl	Remarks or Comment No.
	٥	F/U Req	Sub Sec	·	Yeş	No	Not A	
отн	2		a	Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No N/A Section 725.177: Additional Reports Has the owner or operator submitted to the Agency, as required, reports concerning: 1) Releases, fires, explosions as specified in Section 725.156?	X			
			b	Yes No N/A 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes No N/A				
			С	3) Facility closure as specified in Section 725.215? Yes No N/A 🔀				
	٠							1

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements			
CLO	1			Section 725.212: Closure Plan	7		4
			a	Was the most current facility closure plan available during the inspection? Yes No			
				Was the closure plan submitted to the Agency within the time frames specified below:			
				- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes No N/A			
				- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A			
				- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A			·
				- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A			1

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
FIN	1	Req	ā	- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes No N/A	Yeş	No	Not	
				noir. Il no host-ciosale hian, mark n/n .				

Ares	Cíass	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				·
НТО	1	х		Section 725.271: Condition of Containers	X			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
ОТН	1	х		Section 725.272: Compatibility of Waste with Containers	2		-	
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
ОТН	1	х		Section 725.273: Management of Containers	\times			
			a	Are containers of hazardous waste always closed during storage? Yes No				
·			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				
нто	2			Section 725.274: Inspections	X			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes X No				,

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Al Com	operent oliance? No	Not Applicable	Remarks or Comment No.
				NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
ОТН	1	X		Section 725.276: Special Requirements for Ignitable or Reactive Wastes	X			
				Are containers holding ignitable or reactive waste located at least 50 feet from the property line?				
ОТН	1	х		Section 725.277: Special Requirements for Incompatible Wastes	X			
		·		Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				
								,

								KEV1310N 1 (0/13/00)
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yes	parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems				
				Section 725.290: Applicability				
				Does the facility store or treat hazardous waste in tanks? Yes X No				
				If "No", skip Subpart J.			1	
				NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.				
				Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No 13/4 ×				
				NOTE: Failing the filter test means that the waste contains free liquids.				
ОТН	2			Section 725.291: Assessment of Existing Tank Systems	X			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No				
				NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				
								l .
]								

Area	Class	90 Day F/U	Key Ltr	 Requirement		parent liance?	Applicable	Remarks or Comment No.
		Req	Sec		Yeş	140	Not	
			b	Does this assessment consider at least the following:				
				 available standards for the tank and ancillary equipment; 				
				hazardous characteristics of the wastes;				
				existing corrosion protection measures;				
}				4) age of the tank system; and				
				5) results of a leak test, internal inspection, or other tank integrity examination? Yes <u>×</u> No				
ОТН	1			Section 725.292: Design and Installation of New Tank Systems or Components			Δ	
			a	For new tanks (built after July 14, 1986) was an inde- pendent, certified written assessment prepared? Yes No				
				Does the assessment include, at a minimum, the following:				•
				 design standards for tanks and ancillary equipment; 				
				NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.				
				2) hazardous characteristics of the waste; and				
				3) evaluation of potential for corrosion and corrosion protection measures? Yes No				1

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No				
ОТН				Section 725.293: Containment and Detection of Releases	ļ -		X.	
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes No N/A				Ages of tanks are unknown and faulty
			a 2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				is not 15 yes old yet. Secondary containers
			a 3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				does not have the
			a 4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A				
				<u>or</u>				
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No NA				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	pparent Diance? No	Not Applicable	Remarks or Comment No.
			ь182	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A				
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).				
			с4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A				
		ļ		NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.				
			d	Does the secondary containment have one or more of the following:				N/A - see above.
				 a liner (external to the tank); or 				
				2) a vault; or				
				3) a double-walled tank; or				
				4) an equivalent device (approved by the Board)? Yes No N/A				
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.				
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				. 🗸

Area	Class	90 Day F/U	Key Ltr Sub	Requirement	Comp	parent lianc 3?	⋖	Remarks or Comment No.
Aree	, Clas		Sub Sec	1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes No N/A	Yeş	lianc 3?	Not App	Remarks or Comment No.
				ich le				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	". Requirement	In Ap Comp	oparent oliance No	Not Applicable	Remarks or Comment No.
ОТН	1	X	b1&2	Section 725.294: General Operating Requirements Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby		×		No level sensing
			b3	tank)? Yes No Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A				davices.
			С	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A X				
ОТН	2	 - - -	c	Section 725.295: Inspections Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes No No	× -			
OTII	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No			X	•
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725 094(c).				

	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	4. Requirement	Comp	parent lian :e?	Appl	Remarks or Comment No.
. [If a tank or secondary containment system has leaked, has the owner done the following:				NA
				a	<pre>1) Ceased using, stopped inflow of wastes? Yes No</pre>				
				b	2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes No				
}					3) Taken actions to prevent waste migration and removed and properly disposed of visibly con- taminated soil or subsurface water? Yes No				
				đ	4) Reported to the Agency within 24 hours of detection? Yes No				
					NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.				
					5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No				
				e4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No N/A				
					NOTE: If the component is above ground and can be visually inspected then see odary containment is not needed.				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	 Requirement	Comp	parent liance?		Remarks or Comment No.
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after				
				returning the tank system to use? Yes No N/A				V
CLO	1			Section 725.297: Closure and Post Closure Care			X	No closures
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				100 (10,94-4)
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No				
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes No				
			b	If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No				
				NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				
•		'	.,	1SD J-8	1 "l	'		

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent No		Remarks or Comment No.
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes	λ			
				Are ignitable or reactive wastes stored in tanks? Yes X No NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No	<u> </u>			
				NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.				
				Are there proper protective distances between the waste management area and the facility boundary line? Yes No				
нто	1			Section 725.299: Special Requirements for Incompatible Wastes			X	No incorportables in tanks.
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A				(4762)
					•			
								ţ

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	n. Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner: 1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A or 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.			X	Do significantly desired in tracks.

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Inspectors: Facility Representative:		IERH/EPS	
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Facility Representative:	John Maker Bob Garage Generate Prans	Plunt Manager Oct Treat	7 <u>9</u> /345-9 736 738/738 - 650
Facility Representative: F-Solvent	John Maker Bob Garage Generate Prans	Plunt Manager Oct Treat	7 <u>9</u> /345-9 736 738/738 - 650
Facility Representative: F-Solvent Dioxin	John Maker Bob Garage Generate Prans	TERNIERS Plant Mannett	7 <u>9</u> /345-9 736 738/738 - 650

Revised 10-20-89

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INSPECTION SUMARY

Processes That Generate LDR Wastes

Temporary storage and generation of hazardons waste fuels.

DR Waste Management

Wastes are mortaged in tanks and containers. Some containers are also solved within theter semi-trailers. Tanks are used for both storage and treatment.

Summary

The apparent violation was observed during the inspection:

722. 150(a)(2) - failure to & mark containers with

the Storage date.

WASTE IDENTIFICATION

 Does	the facility handle the following wastes?
а.	F001 through F005 spent solvents
	Yes No List*
Þ.	Dioxin-containing Wastes
	Tes No List*
c.	California List Wastes
	Yes . No List*
-i	First and Second Third Wastes
	Tes ID List*
	* List wastes if room allows or attach Appendix A.
	Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities)
Does	the facility handle the following wastes (national capacity variances)?
a.	F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).
	Yes No 🔀 Comments
:	Dioxin contaminated soil and debris resulting from a CERCIA response action or a RCRA corrective action (effective date — 11/08/90).
	Yes No Comments
c.	California list contaminated soil or debris resulting from a CERCIA response action or a RCRA corrective action (effective date — 11/08/90).
	Yes No Comments

	K051, K052, or K071 (effective date - 08/08/90).
	Yes No 🚈 Comments
e.	First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).
	Yes No <u>Comments</u>
f.	Second Third contaminated soil and debris which have a treatment standard based on incineration — F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).
	Yes No 🔼 Comments

CENERATOR CHECKLIST

SENERATOR REQUIREMENTS

A.

Tre	atability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes X No NA
	If yes, check the appropriate treatability group.
	<pre>Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight) All other spent solvent wastes</pre>
2.	First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA NA
	If yes, list the waste code and check the correct treatability group.
	Waste Code Wastewater* Non-wastewater
	cedes except divini
	
	* Loss than 1% TOC by weight and less than 1% filterable solids.
3.	California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
•	Yes No NA <u>X</u>
	If yes, specify the method:

5

Revised 10-20-89

	b.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?
		Yes No NA $ imes$
		If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:
	с.	For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart 0 or 40 CFR Part 265 Subpart 0?
		res_ No X NA_ Used astuel (per Part 726)
4.		the generator mix restricted wastes with different treatment dards?
	Yes	X No _ comments L'aste product is sent as fuel.
		es, did the generator select the most stringent treatment standards .41(b), 268.43(b))?
	Yes .	No comments Waster are increased in a cement kill
ias:	e Ana	<u>lysis</u>
·		the generator determine whether the restricted waste exceeds themselves the standards or prohibition levels at the point of generation by:
	-	Knowledge of waste Yes \underline{X} No
		List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination. [Jaste included listed Selvents

		was all supporting data retained on-site, [268.7(a)(5)]?
		Yes 🔨 No
	-	TCLP Yes No NA X_
		List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	_	Total constituent analysis Yes No NA >_
		List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		pH < 2 Yes X No _ NA _
	-	•
		List the wastes for which pH testing was used. All wastes suspected of being corresive
	-	Paint Filter Liquid Test Yes No NA 🔀
		List the wastes for which PFLT was used.
ũ.		the facility dilute the restricted waste as a substitute for adequate thent [268.3]?
	:es	_ % <u>X</u> %
c.	Mana	ogenent.
	1.	On-Site Management
		Is restricted waste treated, stored for greater than 90 days, or disposed on-site?
	_	Yes & NO _ comments _ Site has interin Status
		If yes, the TSD Checklist must be completed.

OLL	-Site ranagement	
a.	Does the generator ship any was	aste that exceeds the treatment ument or storage facility?
	Yes $\frac{\lambda}{\lambda}$ No (If no, go	to b)
	If yes, identify waste code ar facilities:	nd off-site treatment or storage
	Waste Code Facil	lities <u>Treat/Store</u>
	He caste	
		
-	Does the generator provide not facility [268.7(a)(1)]?	cification to the treatment or storage
	Yes 🔀 No	
-	Does notification contain the	following?
	EPA Hazardous waste number(s)	Yes 🔀 No
	Applicable treatment standards and prohibition levels	Yes <u>></u> No
	Manifest number	Yes 🔀 No
	Waste analysis data, if availa	ble Yes 🔀 No
۵.	Does the facility ship any was to an off-site disposal facili	te that meets the treatment standards
	Yes No \(\sum (If no, go	to c)
	If yes, identify waste code an	d off-site disposal facilities:
	Waste Code	Facility
		

-	Does the facility provide notificathe disposal facility [268.7(a)(2)	
	Yes No	
-	Does notification contain the following	owing?
	EFA Hazardous waste number(s)	Yes No
	Applicable treatment standards and prohibition levels	Yes No
	Manifest number	Yes No
	Waste analysis data, if available	Yes No
	Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes No
с.	Is the waste subject to a nationwice extension (268.5), or no migration	
	Yes No ½ (If a	no, go to d)
	If yes, does the generator provide receiving facility that the waste : disposal [268.7(a)(3)]?	
	Yes No	
-	Does the notification contain the	following information?
	EPA hazardous waste number	Yes No
	The corresponding treatment standar and all applicable prohibitions	rds Yes No
	Manifest number	Yes No
	Waste analysis data, if available	Yes No
	Date the waste is subject to the prohibitions	Yes No
đ.	Does the facility generate any Firstwaste?	st or Second Third "soft hammer"
	Yes No (If no, go	to 4)

	_		he generator provide the followin ing facility with each shipment o		
		(i)	EPA hazardous waste number	Yes	No
		(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes	No
	(iii)	Manifest number	Yes	No
		(iv)	Waste analysis data, if available	Yes	No
3.	"Sof	t Hamme	r" Demonstrations/Certifications		
	а.		y "soft hammer" wastes or treatme te disposal in a landfill or surf		
		:'es	No		
	٥.	recover	e generator attempted to locate a ry facilities that provide treatm nmental benefit [268.8(a)(1)]?		
		Yes	_ No		
	c.	Regiona	e generator submitted a demonstra al Administrator to document its ole treatment [268.8(a)(2)]?		
		Yes	_ No		
	-		, did the generator submit the docication prior to first shipment?	cumentatio	n and
		Yes	. No		
	đ.	Does th	ne demonstration contain the follo	owing info	rmation?
			of facilities and facility als contacted?	Yes	No
		Address	ses	Yes	%o
		Telepho	one numbers	Yes	.w
		Contact	: dates	Yes	No
		Certifi	.cation statement	Yes	No

э.	If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?
	Yes No NA
	If yes, attach a copy of written discussion.
f.	Does the generator ship its "soft hammer" waste off-site for treatment?
	Yes No
	Describe the type of treatment and treatment facilities:
	Waste Code Type of Treatment Treatment Facility
g.	Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?
	Yes No
ħ.	Does the generator provide certification with each subsequent snipment of wastes to receiving facilities?
	Yes No NA
Recor	ds Retention
	the facility retain on-site copies of all notifications, strations, and certifications for a period of 5 years [268.7(a)(6)]?
∵es _	No Comments

Attach a copy of the demonstration and certification.

3 C R	A Corrective Action and CERCIA Response Action Waste
· -•	Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCIA response action in a landfill or surface impoundment?
	Yes No Comments
2.	Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?
	Yes No NA Comments
	Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary
	neutralization, etc.)?
	Yes No <u>></u>
	List types of waste treatment units and processes:
	Waste Code Type of Treatment Treatment Units and Processes
2.	Are treatment residuals generated from these units?
	Yes No Comments
	Yes No Comments If yes, the residues are subject to the LDR generator requirements.

Yes __ No __ NA __ Comments _

If yes, the TSD checklist must be completed.

		analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).
		Yes No X NA _ (Sec c.")
		e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified HTAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.
		Yes _ No X NA _ (See "C.")
		* BDAT= best demonstrated available technology
	3.	Are the operating records, including analyses and quantities, complete [264/265.73]?
		Yes No
	÷.	Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.
		Yes 🔬 No Comments
в.	Stor	age (268.50)
	1.	Are prohibited wastes* stored on-site?
		Yes \geq No (If no, go to C, Treatment.)
		* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal $\{53\ \underline{FR}\ 31208,\ August\ 17,\ 1988\}$.
	<u>.</u> .	If yes, identify storage unit.
		Tanks Containers Other (Identify inappropriate storage unit(s)
		Const (Identity Mappings and Storage Witter).
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?
	_	Yes _ NO X NA _ Some container, were not marked

TSD CHECKLIST

TSD REQUIREMENTS

<u>GET</u>	erai .	racility Stantains			
1.	Does	s the waste analysis plan	cover Part	t 268 req	uirements [264/265.13]?
		F-solvent (TCLP)*	Yes.	No	NPA
		Dioxin (TCLP)	Yes	No	NA X
		California List (PFLT and/or total const			NA
		First & Second Third (TCLP and/or total const			NA
		* TCLP= Toxicity Charact PFLT= Paint Filter Liq			rocedure (268, App. I)
2.		the facility obtain repr es and residues?	esentative	e chemical	and physical analyses of
	Yes	X No Comments _			
	a.	What date was the waste	analysis p	olan last	revised?
	b.	Are analyses conducted o	n-site or	off-site?	•
		On-siteX	_ Off-site	Eccep	+ flyer printing
		Identify off-site lab:	HES	Labs.	
	c.	Are F-solvent and dioxin TCLP?	containin	ng waste a	nalyzed using
		Yes No NA	F-50	wents a	clearly exceed
~			> (2)	moords.	

4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?
	Yes K. No
5.	Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?
	Yes No NA
6.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes <u> </u>
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?
	Yes No
7.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?
	Yes <u>X</u> No NA
8.	Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?
	Yes No & NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No NA <
	If yes, state how:
9.	Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:
	a. In a facility meeting the TSCA criteria in 761.65(b)?
	Yes No NA <u>×</u>
	b. More than one year [268.50(f)]?
	Yes No NA <u> </u>

1.	Does the facility treat restricted wastes other than in surface impoundments?
	Yes No (If no, go to D, Surface Impoundments.)
2.	Describe the waste codes and treatment processes:
	Waste Code Treatment Processes
	Physical & Chemical Separation Took Feething
3.	Was dilution used as a substitute for treatment [268.3]?
	Yes No _ Comments
₹.	Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?
	Yes No Comments
	Have treatment standards or prohibition levels been met?
	Yes _ No N/A comments Not treating to reduce constituents.
5.	Does the facility ship any waste or treatment residue to an off-site disposal facility?
	Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??
	Yes 🔀 No (If yes, the Generator portion of the checklist must be completed.)
ó.	If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?
	Yes A No _

\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Does the facility treat "soft hammer" wastes?
. 1	Yes No (If no, go to 8.)
	a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?
	Yes No
	b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?
	Yes No
8.	Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?
	ïes No NA
	If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?
	Yes No NA
	Identify waste codes and off-site facilities:
1	
3.	Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?
	Yes X No

3. Surface Impoundments

1.	Are prohibited wastes placed in surface impoundments for treatment?
	Yes No X List (If no, go to E, Land Disposal.)
2.	Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?
	Yes No
3.	Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?
	Yes No
4.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
	Yes No NA
5.	Have the Subpart F groundwater monitoring requirements been met?
	Yes No NA
6.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
	Yes No
	Attach test results.
- .	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?
	Sludge Yes No Waste Code
	Supernatant Yes No Waste Code
8.	Provide the frequency of analyses conducted on treatment residues:

9.		s the operating record adequately document the results of waste lyses performed in accordance with 40 CFR 268?
	Yes	No
10.		sludge residues that exceed the treatment standards and/or nibition levels removed adequately on an annual basis?
	Yes	No Comments
	a.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
		Yes No
	b.	Are residues subsequently managed in another surface impoundment?
		Yes No
	c.	Are residues treated prior to disposal?
		Yes No Comments
		If yes, are waste residues treated on-site or off-site?
		On-site Off-site
		Identify waste code and treatment method:
		Waste Code Treatment Method
<u>.</u> .		upermatant is determined to exceed treatment standards, is annual ughput greater than impoundment volume?
	Yes	No Comments

Ξ.	Land	Dis	cosa l
~.			

1.	Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?
	Yes No
	Note: Do not include surface impoundments addressed in D, Surface Impoundments.
	If yes, specify which units and what wastes each unit has received:
2.	Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.
	Yes No
3.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?
	Yes No
	If yes, at what frequency?
4.	If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?
	Yes No
5.	Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?
	Yes No Comments
. .	If yes, have the minimum technology requirements been met for all units receiving such wastes?
	Yes No

.	wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?
	Yes No NA
7.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?
	Yes No NA
8.	Are restricted wastes placed in underground injection wells?
	Yes No List

FOG

Facility:	Hetrochen	1 Services q	Inc. (Heritage	Environn	nental Services)
U.S. EPA I.D. No. :			031162		
Street:	1 Stephen	n St. (Canal Bank R	d. NE) R	0. Box 337
City:	Lemont		State: <u>IL -</u>	zip: <u>60</u> 6	539
Telephone:	708-73	9-1150			
Owner/Operator:	Water A	Reclamati	ion District o	f Greate	in Chicago
Street:	100 E.	Erie St-			
City:	Chicago		State: <u>IL</u> .	Zip: _60	BOHIN E 11)
Telephone:	312-6	15-8099		(D)	
Inspection Date:		Time: 10	:00-1:00pm	DO 19	A DORA
-	Claudy			OF	OF OF RORA
Weather Conditions:	- county,	757		WASTEP	A REGION V
	Name		Agency/Title		lephone
Inspectors:	MARK Ret	claff	IEPA/EPS	708.345	-9786
Facility Representative:	Paul Z	ijec Pl	lant Foreman (1	4ES) 708	<u>-739-1</u> 50
	<u>Generate</u>	Transport	Treat	_Store	<u>Dispose</u>
F-Solvent					
Dioxin					–
California List	<u> </u>		<u> </u>	<u> </u>	
First Third				<u>_ </u>	
Second Third					RECEIVED
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Processes That Generate LDR Wastes

(See Marrative)

LDR Waste Management

Summary

No apparent violations observed See attache hanative

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Revised 10-20-89

0311620007 - Cook County Heritage Environmental Services, Inc. ILD 085349264 March 9, 1990

NARRATIVE

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

HAZARDOUS WASTES

Hazardous Waste Fuel F001-F005

- Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns.
- Rate of generation is approximately 500,000 gallons per year.
- Waste is sent to Systech in Indiana and Continental Cement in Missouri and burned in cement kilns.
- About 42,658 gallons are on-site in tank storage.

Used Oil and Oil/Water Mixtures - D008

- Waste is brought in from off-site and is waste that HES cannot treat.
- Rate of generation is about 60,000 gallons per year.
- Shipped off-site to HES in Indiana for treatment.
- 2051 gallons are currently on-site.

Waste Petroleum Naphtha - D001

- Generated from parts degreasers in the maintenance garage.
- Rate of generation is 30 gallons per month.
- Waste is sent to Safety Kleen in Mokena, IL for reclamation.
- 30 gallons are currently on-site.

Waste Flammable Solids - F003, D008

- Contaminated spill pads from emergency clean-ups. Also, consists of solids from supplemental fuel production.
- Rate of generation varies from year to year.
- Waste is shipped to CWM in Chicago for incineration.
- 44 drums are on-site.

0311620007 - Cook County Heritage Environmental Services, Inc. ILD085349264 March 9, 1990 Page 2

Flammable Solids F001-F005

- Generated from strainer cleaning of secondary fuel blending process.
- Rate of generation is 25-50 55-gallon drums per year.
- Waste is shipped to Rollins Environmental in Louisiana for incineration.
- 11 drums are on-site.

Lab Pak Waste - D001, D002

- Generated from Westmont High School from discarded laboratory chemicals and chemical cleaners.
- Waste is not routinely generated, one time generation only.
- 14 drums of waste are currently stored on-site in trailer storage.

NON-HAZARDOUS SPECIAL WASTE

Crushed Drums

- RCRA empty 55 gallon drums.
- 6 loads are generated yearly.
- Shipped to CID #2 for landfilling.
- Currently less than one load on-site.

Solids

- Non-hazardous tank bottoms and soil from remediation activity.
- Rate of generation varies year to year.
- Shipped to CID #2 for landfilling.
- Less than one load on-site.

Waste Oil

- Non-hazardous loads not gravity separated.
- Rate of generation is about 75,000 gallons per year.
- Shipped to HES in Indiana for treatment.
- 2 drums on-site.

Treatment Water

- Rain water and water separated from non-hazardous oil streams.
- About 100,000 gallons generated yearly.
- Shipped to HES in Indiana for treatment.
- 28,751 gallons currently on-site.

REGULATED HAZARDOUS WASTE UNITS

Container Storage Area (SO1)

Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete

0311620007 - Cook County Heritage Environmental Services, Inc. ILD085349264 March 9, 1990 Page 3

pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

<u>Trailer #</u>

#1. 2040 gal. - D001

#2. 415 gal. - D001

#3. 1825 gal. - D001

#4. 535 gal. - D002

#5. 115 gal. - Poisons (U and P)

#6. 20 gal. - D002

#7. 120 gal. - D001

Drum Storage Area (Diked) = 7,240 gal.

Tank Storage (SO2)

Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through St 6 tanks.

Waste Pile (SO3)

Waste Pile (SO3) activity appears on Part A, however, this activity has never occurred.

Tank Treatment (TO1)

Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.

Treatment in Containers (TO4)

Treatment in containers. Treatment in containers is not occurring at this time.

Note 1: Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.

Note 2: A CAFO was issued on 9/26/85. No copy could be found in Region II files. Per previous inspector, HES has been in compliance with the CAFO for some time.

From the information obtained during this inspection, it appears that HES is a hazardous waste generator, treatment and storage facility.

0311620007 - Cook County Heritage Environmental Services, Inc. ILD085349264 March 9, 1990 Page 4

Apparent Violations

No apparent violations were observed during this inspection.

Subparts G and H were not addressed during this March 9, 1990 inspection.

MR:bh:4731B

WASIE IDENTIFICATION

١.	Does	the facility handle the following wastes?
	a.	F001 through F005 spent solvents
		Yes V No List* <u>Fool - Foos</u>
	b.	Dioxin-containing Wastes
		Yes No <u>v</u> List*
	c.	California List Wastes
		Yes <u>V</u> No List*
	đ.	First and Second Third Wastes
		First and Second Third Wastes PO18, U129, P123, P001. Yes No List* U129, U036, U051, U188, U122, P037, U036, U061
		* List wastes if room allows or attach Appendix A.
		Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).
2.	Does	the facility handle the following wastes (national capacity variances)?
	a.	F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).
		Yes - No _ Comments ERU, DCI, Cleanyps
٠	b.	Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).
		Yes No V Comments
	c.	California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date 11/08/90).
		Yes V No _ Comments ERU, DCI, Cleanup

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a.	K051, K052, or K071 (effective date - 08/08/90).		
	Yes No <au href="#">Vo Comments</au>		
e.	First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).		
	Yes No Comments		
f.	Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).		
	Vec No V Connents		

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

Tre	atability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes V No NA _
	If yes, check the appropriate treatability group.
	Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight) All other spent solvent wastes
2.	First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, list the waste code and check the correct treatability group.
	Waste Code Wastewater* Non-wastewater U14, u346
	4051, 4188 4022, P.027 4034, 4061 P018, 4129
	P23, P001
	* Less than 1% TOC by weight and less than 1% filterable solids.
3.	California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	Yes _ NO _ NA ~ NO PCB's
	If yes, specify the method:
	5 Revised 10-20-8 RECEIVED

	.D.	greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]? Yes No NA
		If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:
	c.	For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart C or 40 CFR Part 265 Subpart O? Yes No NA
1. P/A		the generator mix restricted wastes with different treatment and ards?
	If y	No Comments
	Yes	No_1_ Comments
B. Was	ste Ana	alysis
1.		s the generator determine whether the restricted waste exceeds at ment standards or prohibition levels at the point of generation by:
	-	Knowledge of waste, Yes No CW A away 5 List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
	·	6 Revised 10-20-89

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		Was all supporting data retained on-site, [268.7(a)(5)]?
		Yes No
	-	TCLP Yes No V NA
		List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		· _
	-	Total constituent analysis Yes 🗹 No NA
		List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		FOOI-FOOS 9-15-89, DOOL, DOOD 2-22-89 DOOD - 9-7-89
	-	pH ≤ 2 Yes <u>✓</u> No NA
		List the wastes for which pH testing was used.
	-	Paint Filter Liquid Test Yes No NA
		List the wastes for which PFLT was used.
2.		the facility dilute the restricted waste as a substitute for adequate thent [268.3]?
	Yes	No <u> NA</u>
c.	Mana	genent.
	1.	On-Site Management
		Is restricted waste treated, stored for greater than 90 days, or disposed on-site?
		Yes No _ Comments _ Soved.
		If yes, the TSD Checklist must be completed.

a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
	Yes V No (If no, go to b)
	If yes, identify waste code and off-site treatment or storage facilities:
	Waste Code Facilities Treat/Store From Foos Suffection Treated
	FOOI- FOOS Systech Treatment FOOI- FOOS Missairi: Cont. Coment Treatment Dood HES, IN Treatment
-	Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
	Yes No
-	Does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes V No and prohibition levels
	Manifest number Yes No
	Waste analysis data, if available Yes No
b.	Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?
	Yes No (If no, go to c)
	If yes, identify waste code and off-site disposal facilities:
<u> </u>	Waste Code Facility
b/r	
+	
V	

Off-Site Management

By.	Does the facility provide notificat the disposal facility [268.7(a)(2)]		ertificati	on to
	Yes No			
-	Does notification contain the follow	owing?		
	EPA Hazardous waste number(s)	Yes	No	
	Applicable treatment standards and prohibition levels	Yes	No	
	Manifest number	Yes	No	
\	Waste analysis data, if available	Yes	No	
1	Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes	No	
с.	Is the waste subject to a nationwice extension (268.5), or no migration			-case
1	Yes No (If r	no, go to	d)	
p (m-	If yes, does the generator provide receiving facility that the waste disposal [268.7(a)(3)]?			
	Yes No			
-	Does the notification contain the	following	informatio	n?
·	EPA hazardous waste number	Yes	No _	
	The corresponding treatment standar and all applicable prohibitions		No _	-
	Manifest number	Yes	No _	
	Waste analysis data, if available	Yes	No _	
\bigvee	Date the waste is subject to the prohibitions	Yes	No _	
đ.	Does the facility generate any First waste?	st or Seco	and Third "	soft hammer"
	Yes Vo (If no, go	o to 4)		

1		(i)	EPA hazardous wa	ste number	Yes 🔽	No
; ; ;		(ii)	Applicable prohil [268.33(f), 268.		Yes	No
	1	(iii)	Manifest number		Yes <u>~</u>	
		(iv)	Waste analysis d if available	ata,	Yes _	No
3.	"So	ft Hamme	r" Demonstrations	/Certifications		
pla	a. / \	Are an ultima	y "soft hammer" w te disposal in a	astes or treatment landfill or surf	nt residue ace impoun	s destined for dment?
:		Yes	- No 🔀 Beng	- الملكمية		
	b.	recove		t provide treatm		t with treatment and ields the greatest
i		Yes	No			
	c.	Region		to document its		ertification to the locate practically
1		Yes	_ No			
	_		, did the generatication prior to		cumentatio	n and
$\langle $		Yes	_ No			
X	đ.	Does ti	he demonstration (contain the foll	owing info	rmation?
)			of facilities and als contacted?	î facility	Yes	No
1		Address	ses		Yes	No
		Telepha	one numbe rs		Yes	No
\bigvee		Contact	t dates		Yes	No
•		Certif	ication statement		Yes	No
				10	Revised 10	-20-89

Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

	e.	If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste $[268.8(a)(2)(i)]$?
		Yes No NA
		If yes, attach a copy of written discussion.
HAP .	f.	Does the generator ship its "soft hammer" waste off-site for treatment?
		Yes No
1		Describe the type of treatment and treatment facilities:
		Waste Code Type of Treatment Treatment Facility 4/14, 4036 4/1661, 4/188 Incincrator Systech
		(1/2) FUST
		1036 (1061 P018, 1179
		P123, Pso1
	g.	Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?
		Yes No
	h.	Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?
W	,	Yes No NA
4.	Reco	rds Retention
		the facility retain on-site copies of all notifications, nstrations, and certifications for a period of 5 years [268.7(a)(6)]?
	Yes	No Comments

Attach a copy of the demonstration and certification.

D.	RCRA	Corrective Action and CERCIA Response Action Waste
	1.	Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?
		Yes No /_ Comments
	2.	Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?
		Yes No NA _V Comments
E.	Trea	tment Using RCRA 264/265 Exempt Units or Processes
	1.	Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?
		Yes No <u></u>
		List types of waste treatment units and processes:
		Waste Code
	2.	Are treatment residuals generated from these units?
		Yes No <u>~</u> Comments
		If yes, the residues are subject to the LDR generator requirements.
	3.	Are these residuals further treated, stored for greater than 90 days, or disposed on-site?
		Yes No NA Comments
		If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION TRANSPORTER CHECKLIST

N	SPORTER REQUIREMENTS N
	Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?
	Yes No
	If yes, check the appropriate regulatory status:
	Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
	If yes, list the restricted wastes that have been mixed.
	Is the waste treated in an exempt treatment process on-site?
	Yes No

ROPA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

_	_		•	
_		F-3-7-1	1411 [34 ADVIOLATIO
A -		ra.ii.	11.V .	Standards
,				

1.	Does	the waste analysis plan	cover Part	: 268 requ	nirements [264/265.13]?
		F-solvent (TCLP)*	Yes 👱	No	NA
		Dioxin (TCLP)	Yes	No	na <u>v</u>
		California List (PFLT and/or total const			NA
		First & Second Third (TCLP and/or total const			NA
		* TCLP= Toxicity Charact PFLT= Paint Filter Lic			rocedure (268, Appp. I)
2.	wast	es and residues?	<u>a-</u>		and physical analyses of
	Yes .	V No Comments	thegupe	mit, po	4
	a.		analysis p		revised? //-8-88
	b.	Are analyses conducted o	on-site or	off-site?	,
		On-site	_ Off-site	•	•
		Identify off-site lab:	Provided	by ge	nerator
	c.	Are F-solvent and dioxir TCLP?	n containin	g waste a	nalyzed using
		Yes No V NA _	_		

		analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).
		Yes Vo No NA
		e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.
		Yes No WW NA
		* BDAT= best demonstrated available technology
	3.	Are the operating records, including analyses and quantities, complete [264/265.73]?
		Yes V No
	4.	Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.
		Yes No Comments
B.	Stor	age (268.50)
	1.	Are prohibited wastes* stored on-site?
		Yes No (If no, go to C, Treatment.)
		* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].
	2.	If yes, identify storage unit.
		Tanks Containers Other (Identify inappropriate storage unit(s)
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?
		Yes No NA

71.	dates that the wastes enter and leave storage (264/265.73)?
	Yes Vo
5.	Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?
	Yes <u>~ No _ NA _ </u>
6.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?
	Yes No
7.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?
	Yes No NA
8.	Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?
	Yes No <u>~</u> NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No NA
	If yes, state how:
9.	Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored: $\rho_0 + \rho_0$
•	a. In a facility meeting the TSCA criteria in 761.65(b)?
	Yes No NA
	b. More than one year [268.50(f)]?
	Yes No NA 3

c.	Trea	tment.
	1.	Does the facility treat restricted wastes other than in surface impoundments?
		Yes No (If no, go to D, Surface Impoundments.)
	2.	Describe the waste codes and treatment processes:
		Waste Code Treatment Processes
		6001-6005 Heat treatment
	3.	Was dilution used as a substitute for treatment [268.3]?
		Yes No Comments
	4.	Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?
		Yes No Comments
		Have treatment standards or prohibition levels been met?
		Yes No Comments
	5.	Does the facility ship any waste or treatment residue to an off-site disposal facility?
		Yes No NA

NIA

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ___ No ___

VIL 7.	Does the facility treat "soft hammer" wastes?
211	Yes No (If no, go to 8.)
	a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?
	Yes No
	b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?
	Yes No
8.	Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?
	Yes No NA
	If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?
	Yes No NA
	Identify waste codes and off-site facilities:
	Waste Code Facility
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
9.	Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?
	Yes No

D. Surface Impoundments

Are prohibited wastes placed in surface i	impoundments for treatment?
Yes No List Disposal.)	(If no, go to E, Land
Are evaporation or dilution the only reco	ognizable treatment occurring in
Yes No	
Did the facility submit to the Agency, the well as, the certification of compliance ground-water monitoring requirements?	
Yes No	
If the minimum technology requirements habeen granted for that unit?	ave not been met, has a waiver
Yes No NA	
Have the Subpart F groundwater monitoring	g requirements been met?
Yes No NA	·
Are representative samples of the sludge surface impoundment tested separately, act the sampling frequency and analysis speciplan?	cceptably, and in accordance with
Yes No	
Attach test results.	
Do the hazardous waste residues (sludges standards specified in 40 CFR 268, or who established for a waste, the applicable p	ere no treatment standards are
Sludge Yes No Waste	Code
Supernatant Yes No Waste	Code
Provide the frequency of analyses conduct	

9.		the operating record adequately document the results of waste lyses performed in accordance with 40 CFR 268?
	Yes	No
10.		sludge residues that exceed the treatment standards and/or mibition levels removed adequately on an annual basis?
	Yes	No Comments
	a.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
		Yes No
	b.	Are residues subsequently managed in another surface impoundment?
		Yes No
	c.	Are residues treated prior to disposal?
		Yes No Comments
		If yes, are waste residues treated on-site or off-site?
		On-site Off-site
		Identify waste code and treatment method:
		Waste Code Treatment Method
11.		supernatant is determined to exceed treatment standards, is annual sughput greater than impoundment volume?
	Yes	No Comments

E. Land Disposal

D _{IA}	1.	such as landfills, surface impoundments, waste piles, land treatment
00	/onl	Yes No Note: Do not include surface impoundments addressed in D, Surface Impoundments. If yes, specify which units and what wastes each unit has received:
	VIR 83	If yes, specify which units and what wastes each unit has received:
	1	
	2.	Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.
į		Yes No
	3.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?
		Yes No
		If yes, at what frequency?
	4.	If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?
		Yes No
	5.	Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?
		Yes No Comments
		If yes, have the minimum technology requirements been met for all units receiving such wastes?
	V	Yes No

6 .	wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?
	Yes No NA
7.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?
\setminus	Yes No NA
8.	Are restricted wastes placed in underground injection wells?
Y	Yes No List

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENC'S INSPECTION REPORT

USEPA Number: 1EPA Number: 03/1620007
Facility Name: PETROCHEM SERVICES INC. (Heritage Environmental Sucs. Inc.)
Street: One Stephen St (NE CANAL BANK RAAD) City: LEMONT Telephone: (312) 739-1150 County: COOK State: IL ZipCode: 60439
Type of Facility: Notified as: C/TS/TR Regulated as: C/TS/TR LDF? HPV? 90 Day Follow-up required? Yes: No: X
Region: Maywood Date of Inspection. From: 9:30 Am to: 2:00 pm. Weather (LDF Only): 350 ORY
Type of Inspection ISS: Sampling: Citizen Complaint: Closed: Other: Record Review: Follow-up to Inspection of: Withdrawal:
Non Regulated Status SQG: Claimed Nonhandler: Other (Specify in Narrative):
Notification date, $\frac{2-19-20}{}$, from (initial) or (subsequent) Notif.
Part A Initial Part A date: 1-12-31 Ammended: 11-8-38 Part A Withdrawal requested: Approved by (US)(IL)EPA:
Part B Permit Application Part B Permit called by (US)((1)) EPA on: 5-6-78 Permit Due: 11-8-89 Part B Permit Submitted: 11-10-79 Draft Permit Issued:
Enforcement Has the firm been referred to: USEPA? Date(s) of initial referral: 4-1-85 RECEIVED
USEPA CACO: 4-1-85 CAFO: 4-2083 ALJ Decision:
PCB Order Issued: State Court Order Issued: IEPA-DLPC
TSD Facility Activity Summary

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	A	ep	ual ort
SUI	Υ	.~	Y	N	γ	N	У	Y	Y
SU2	4	N	Y	Ν	Y	N	У	У	γ
S03	Y	N	N	~	\sim	7	N	J	N.
TOI	γ	\sim	Y	N	7	\sim	Υ	Y	Y
TOY	γ	λ	У	\sim	2	\mathcal{N}	Y	У	N
	<u>:</u>			:					

:.

:======: Nevitage Environmental	Sorvices Jos. Telepino	== ±: (312)739-115
Ciey: Lemont Comer: Metropolitan Sanitary District	Canal Bank Roal State: IL Zip Code + of Gr. Chicago Telephone) : <u>60439</u>
Street: 100 East Frie Street City: Chicago Person Interviewed	State: I Zip Code:	606/1 Telephona #
Paul Zajec	PLANT FOREMAN	(312) 799-1150
Carol Graster Michelle Underwood	Agency/Title IEPA/EPS IEPA/LSCT	Telephone : (3/2) 34/5-977
Mark Retzlaff Laura Tavares	IEPA/LSCT IEPA/LSCT	11
Carol Graszer	Agency/Title IEPA/EPS prent Violations	Telephone : (3/a)345-9480
Area Class Section . Area Class Alo APPARENT VIOLATIONS		lass Section .

e: Heritage Environmental Services Mr. USEPA #: 16085349264 IBPA #: 03/1620007

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	(For waste gen. on	Date of Last Analy- sis	USEPA Haz Waste	0n 8700 -12	On 3510 -3 *	R	Annuet. 1	or	Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
Hazardous Waste Fuel	Secondary Fuel Blending	3-16- 89	0001 F003 F005	γ	Y	7	Y	γ	30,000 GALS	SOU, OUO GALS PER YEAR	3-16- 89	BURNED IN CEMENT. KILNS. EITHER SYSTEC (INDIMMA) DR COUTINENTAL CEMENTIMISON
LOW FLASH TREATMENT WATER	WASTE WATER FRIM TREATMENT OF HAZARDUS WASTE	12-20-	0001	У	У	У	Υ	У	10,000 GALS	15-20000 CALS FER YEAR	12-20 88	CENTURY RESON ES FOR DE WATERING
OIL /WATER MIXTURES		1-11-89	2000	y	Y	7	γ	V	9800 GALS	60,000 GALS PER YEAR	1-11-	SENT TO HES IN INDIANA POLIS POR TREATMENT
TOX- AWAY WASTES	HOUSEHOLD HAZ. WASTE COLLECTION IN INDIANAPOLIS LAB- PACKED	Arrive on site lab packer Temp. storage	YARIES	У	Y	Y	У	У	VΑ	RIES	2-20-	1
UNSTE PETROLEUM NAPINA	PARTS CLEANER	J	0001	Y	γ	У	Y	Y		30 GALS PER MONTH	2-17-	SAFETY KLEST FOR RECLAMATION
WASTE FLAMMABLE SOLIDS	SPILL PADS FROM CLEAN. UPS FROM ERU AN IN SUPPL. FUEL PROOK.	3.8	D001 F003 D008	Y	Y	У	Y	Y	269 drums	VARIES	1, ,	CWM IN OCHICAGO FOR INCINERATION
FLAMMABLE	STRAINER CLEANING IN SELONDARY FUEL BLENDING PROCESS	1-26- 89	F00 2 F00 3 F00 5	7	Y	У	У	Y	9-55g	55 gal	1-26-	ROSS INCINERMINA
									1.17 %11 (41.18) ₩1.18			
er Windows (W. J. a. 1.), stays digment differences a supplie	· Canada Fritish San was 'Th sanda bilandina and 'The sanda bilandina and 'The san and 'The san and 'The san and 'The sanda bilandina and 'The san a				-							

^{*} All "No" responses must be explained in the narrative.

Facility

WASTE DISPOSITION FORM! NUN - HAZAMOUS

Facility o: Haritage Environmental Services Inc. USEPA #: 1LD085349264 IEPA #: 03/1620007

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Waste	On 8700 -12	On 3510 -3	R	Ann	for	on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition,
CRUSHED DRUMS	REPAL EMPTY METAL CONTAINERS	N/A	NON- HAZ		<u>-</u> n	A -		-	EACH LUAD IS APPRY 300 DAWN	6 LOARS PER YEAR	11-15-	LANDFILLED AT CID #2
SOLIDS	NON-HAZ TANL BOTTOMS/FRU SOIL FROM CLEANURS	N/A	NON- HAZ		- ^	A-			NONE	VARIES	12-1-	LAND FILLED
WASTE	NON-HAZ LODOS NOT SEPERATED	2-7-	NON-	_	^	A-			230,000 GALS	275,000 GALS PER YEAR	3-7-	HES IN INDIANAPOLIS FOR FURTHER TREMMENT
TREATMENT	RAIN WATER/ WATER SCPENATED FROM OIL STREAMS	2-1-	NON. HAZ	_	- n	A-		+	30,000 GALS	10		HES IN INDIAN APOLIS EN FURTHER TREMMENT
		Common of the Co										

^{*} All "No" responses must be explained in the narrative.

NARRATIVE

Heritage Environmental Services, Inc. (HES) is a generator, treater and storer of hazardous waste. Transporter activities are performed through HES Indianapolis headquarters. The company consists of two divisions. The first, Remediation/Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES also temporarily stores hazardous waste from IEPA ERU/DCI activities and TOX-Away, an Indianapolis, Indiana program for household hazardous wastes. The second is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance it is stored in the Vacuum Receiving tanks (VR) where it is held until PCB screening is completed. The waste then goes into Cone Botton (CB) tanks where gravity separation occurs. Solids collected from the bottom of these tanks are stored in CB 4, while separated water is stored in CB 3. Oils and water are put into Heat/Treatment (HT) tanks where they are heated to facilitate oil and water separation. The resulting hazardous waste fuel is stored in Oil Storage tanks (OS) where it is held prior to sale to cement kiln burners. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production.

Hazardous Wastes Generated

- Note #1 Wastes going off-site for further treatment, incineration, reclamation or burning are analyzed on the day of transport.
- Hazardous Waste Fuel D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burnt in cement kilns. Two kilns purchase this fuel: Systec in Indiana and Continental Cement in Missouri. There were 30,000 gallons on-site. Approximately 500,000 gallons are generated yearly. The last shipment was to Continental Cement on March 16, 1989.
- Low Flash Water D001. Waste water from the treatment of hazardous waste. There were 10,000 gallons on-site. 15-20,000 gallons are generated per year. The last manifested shipment was December 20, 1988. It was sent to Century Resources for de-watering.
- Used Oil and Oil/Water Mixtures D008. Waste brought on-site from off-site that the facility was unable to treat. There were 9,800 gallons on-site. Approximately 60,000 gallons are generated yearly. The last manifested shipment was on January 11, 1989 and went to HES in Indianapolis for treatment.

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APR - 7 1989

IEPA-DLPC

- TOX-Away Wastes The types and amounts of hazardous waste varies. The waste is part of a household hazardous waste collection program in Indianapolis, Indiana. It arrives and remains lab-packed while on-site. The last manifested shipment was February 20, 1989 and went to Trade Waste Incinerator.
- Waste Petroleum Naptha DOO1. Generated in a parts cleaner in the maintenance garage. 30 gallons are generated monthly. It is transported and treated via a reclamation agreement with Safety Kleen. The last manifested shipment was February 17, 1989.
- Waste Flammable Solids D001, F003, D008. Spill pads from emergency response and solids from supplemental fuel production. The rate of generation varies. There were 269-55 gallon drums on-site. The last manifested shipment was November 1, 1988 and went to CWM in Chicago for incineration.
- Flammable Solids F002, F003, F005. Generated during strainer cleaning in secondary fuel blending process. There were 9-55 gallon drums on-site. 25-50 drums are generated yearly. The last shipment was January 26, 1989 and went to Ross incinerator in Ohio.

Non-Hazardous Wastes Generated

- Crushed Drums RCRA empty 55 gallon drums. There was one load on-site. Each load is approximately 300 drums. Six loads are generated yearly. The last manifested shipment was November 15, 1988 and was landfilled at CID #2.
- Solids Non-hazardous tank bottoms and soil from Emergency Response clean-ups. There wasn't any on-site. The rate of generation varies. The last manifested shipment was December 1, 1988 and was landfilled at CID #2.
- Waste Oil Non-hazardous loads that were not gravity separated. There were 30,000 gallons on-site. Approximately 75,000 gallons are generated per year. The last manifested shipment was February 7, 1989 and went to HES in Indianapolis for treatment.
- Treatment Water Rain water and water separated from non-hazardous oil streams. There were 30,000 gallons on-site. Approximately 100,000 gallons are generated per year. The last manifested shipment was February 2, 1989 and went to HES in Indianapolis for further treatment.

0311620007 March 16, 1989 Page 3

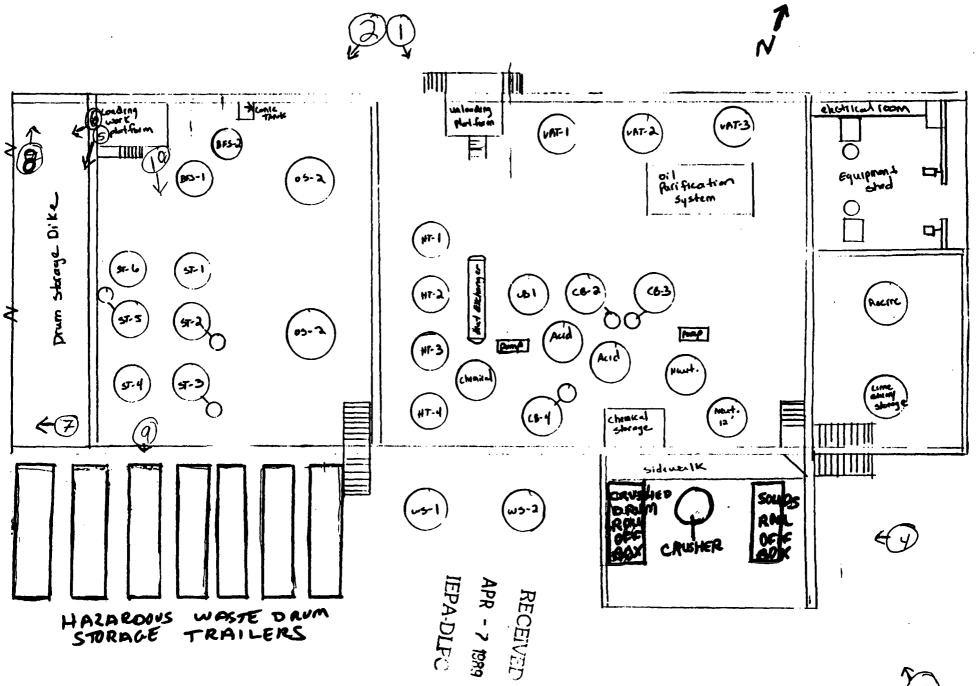
<u>Hazardous Waste Units</u>

- SO1 Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of IEPA/DEA wastes. IEPA/DEA acts as the generator when the waste is sent off-site for incineration.
- SO2 Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- TO1 Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- TO4 Treatment in containers. Treatment in containers is not occurring at this time.

Apparent Violations

There were no apparent violations.

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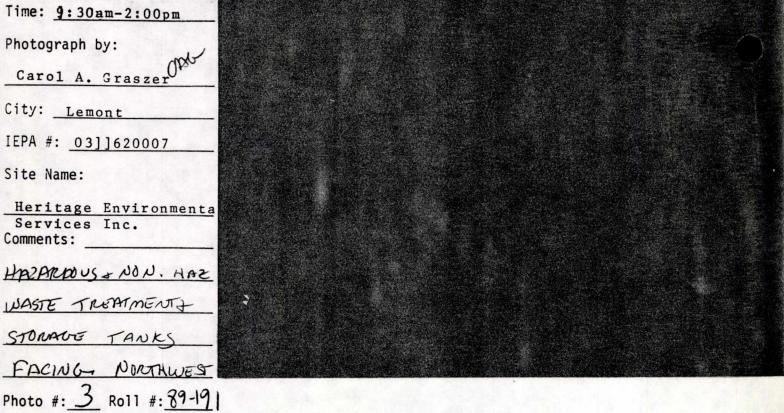


Date: March 16, 1989			
Time: 9:30am-2:00pm			
Photograph by:			
Carol A. Graszer			RECEIVED
City: Lemont			
IEPA #: 03]]620007			APR - 7 1989
Site Name:			IEPA-DLPC
Heritage Environmental Services Inc. Comments:			
HAZARDOUS + NON -			7
HAZ. TREATMENT &			
STORAGE TANKS	i Li		
FACING SOUTHEAST			
Photo #: 1 Roll #: 39-19			
Date: <u>'larch]6,]989</u>			
Time: 9:30am-2:00pm			
Photograph by:			
Carol A. Graszer			
City: Lemont		The second secon	
IEPA #: <u>03]]620007</u>			
Site Name:			
Heritage Environmental Services Inc. Comments:			

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Date: <u>March]6,]989</u>					
Time: 9:30am-2:00pm					
Photograph by:					
Carol A. Graszer					
City: Lemont					
IEPA #: 03]]620007				***	
Site Name:					
Heritage Environmental Services Inc. Comments:					
HAZARDOUS & NON-					
NAZ TREATMENT					
AND STORAGE TANKS					
FACING SOUND WEST					
Photo #: 2 Roll #: 89-191					
Date: <u>larch</u>]6,]989			1		
Time: 9:30am-2:00pm					
Photograph by: Carol A. Graszer					
City: Lemont					
IEPA #: 03]]620007		100.00			
Site Name:					
Heritage Environmental Services Inc. Comments:					
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Date: <u>March</u> 16, 1989 Time: 9:30am-2:00pm Photograph by: Carol A. Graszer City: Lemont IEPA #: 03]]620007 Site Name: Heritage Environmenta Services Inc. Comments: HAZARDOUS & NON. HAZ



Date: <u>| 1arch]6,]989</u>

WASTE TREATMENTY

STONALE TANKS

Time: 9:30am-2:00pm

Photograph by:

app Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmenta Services Inc.

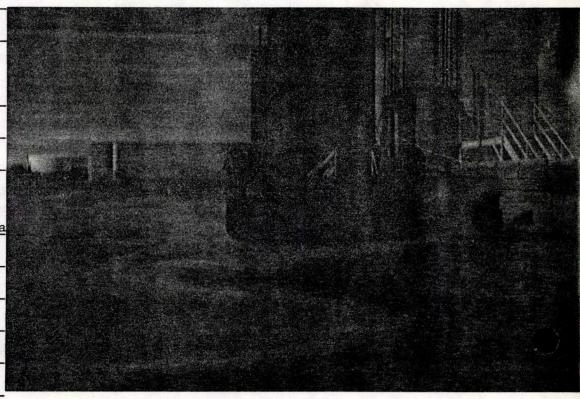
Comments:

SOLIDS ROLL-OFF

BOX DRUM CRUSHER

PRIOCRUSHED DRUM

FACING WEST Photo #: 4 Roll #: 89-191



Date: March 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmental
Services Inc.
Comments: PRIAC UIEW

OF DRUM STORAGE AND

HAZ. WASTE STOMAGE

TRAILERS

FACING SOUTH

Photo #: 5 Roll #: 89-214



Date: 'larch]6,]989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmenta

Services Inc.
Comments: AERIAL VIEW

OF PRUM STORAGE

AREA

FACING SI

Photo #: 6 Roll #: 89-21



Date: warch 16, 1989

Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmenta

Services Inc. Comments:

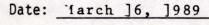
DRUM STUNDED DREA

FOR CORROSIVE

WASTES

FACING NORTH

Photo #: 7 Roll #:89-216



Time: 9:30am-2:00pm

Photograph by:

Carol A. Graszer

City: Lemont

IEPA #: 03]]620007

Site Name:

Heritage Environmenta

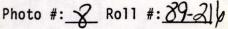
Services Inc. Comments:

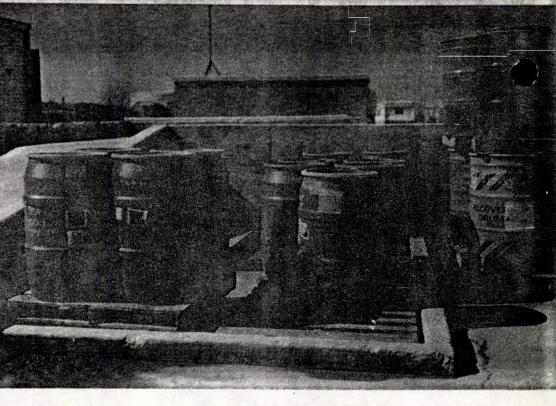
DRUM STORAGE

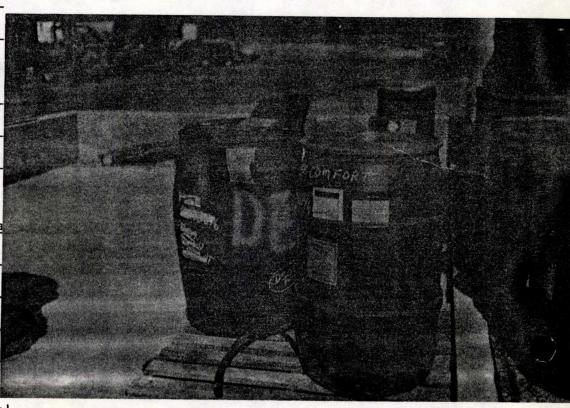
AREA FOR ACID

WASTES

FACING WEST







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Photograph by:					ſ
Carol A. Graszer					
City: Lemont					
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Site Name:	V3G				
Heritage Environmenta Services Inc. Comments:	16	1110 1114		>	
INSIDE DE	11 7				
CORROSIVE ORUM					
STORAGE TRAKER					
FACING SOUTH	W Yes His	CEL (and the second	***
Photo #: 9 Roll #:89-214					
Date: <u>'larch]6,]989</u>					
Time: 9:30am-2:00pm					
Photograph by: Carol A. Graszer		i.			
City: Lemont					
IEPA #: 03]]620007					
Site Name:					
Heritage Environmental Services Inc. Comments:					
STORAGE + TREATMEN	一				
TANKS.					
FACING SOUCH			and the state of t		

Date: March 16, 1989

Photo #: 10 Roll #: 89-216

Aree	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
отн	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications	×			
			a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes No N/A				
				2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes No N/A				
				3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A				
-	IEPA-DLPC	APR - 7 1989	RECEIVED					

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		pparent pliance? No	Not Applicable	- Remarks or Comment No.
отн	1			For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes No Is the facility only operating with a RCRA permit? Yes No NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.			X	NOT A NEW FACILIM
ОТН	1			Section 703.152: Amended Part A Application Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes No N/A 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.	X			

<u> </u>								
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	ot Applicable	Remarks or Comment No.
отн	1			Section 703.154: Prohibitions During Interim Status	Yeş	NO	ŎZ.	
				During interim status, has the facility refrained from:				
			a	 Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No 				
	:		b	 Employing processes not specified in Part A of the permit application? Yes No 				
			С	 Exceeding the design capacities specified in Part A of the permit application? Yes No 				
нто	1			Section 703.155: Changes During Interim Status	X			
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
<i>z</i>			d	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes No N/A				
<i>*</i>								

REVISION 0 (03/05/88)

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. Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
отн	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes \(\sum \) No	X			-
ОТН	1		a C	Did the generator follow the procedures specified in this section in making its determination? Yes No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number? Yes No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes No No	X			
e.								

Area	Class	90 Day F/U Req	Key Lir Sub Sec	Requirement		parent liance? No	Not Applicable	. Remarks or Comment No
MAN	2	neu	b	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check No in the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No	Yes	No	No	
÷								

1			Key		Γ		2	
	ş	90 Day	Ltr			parent	licat	-
Area	Class	F/Ú	Sub	Requirement	Comp	liance?	Apr	Remarks or Comment No.
		Req	Sec		Yeş	No	Not	• •
MAN	2			Section 722.121: Acquisition of Manifests	X			
				Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A For hazardous waste going outside Illinois for treatment,				
		,		storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?				
				or				
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A				
MAN	2	ł	<u> </u>	Section 722.122: Number of Copies	X	1	}	
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				·
MAN	2			Section 722.123: Use of the Manifest	12			
				For each manifest received, has the generator:				
			}	1) Signed the certificate by hand? YesNo				
£				2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	pparent pliance? No	Not Applicable	Remarks or Comment No.
			С	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes NoN/A Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes No N/A				NO BULIC SHIPMENTS BY RAIL OR WATER

Area	Class	"O Day F/U Req	Key Lir Sub Sec	Requirement		parent pliance?	Not Applicable	Remarks or Comment No.
ОТН	1	х		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging	×			-
нто	1			Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
Uin	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
ОТН	1	Х		Section 722.132: Marking	\geq	_		
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No				WASTE INFACED ACCORDINGLY ACTHOUGH IT IS
			b	Is each package of hazardous waste which is ready for transportation off-site marked with:				IMMINENT THANSPOR
				- The generator's name and address? Yes No				
				- The manifest document number associated with the container? Yes No NA				
. -				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No				

Ares .	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1	X	a	Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 III. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist. Condition of Containers (Section 725.271) Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes No N/A		\times	TRANSPORTER PROVIDES PLACAMOS PLACAMOS PLACAMOS PLACAMOS PLACAMOS WASTE IN CONTAINERS + TANKS PRE IN PERMITTED STOKAGE AREA - SEE TSO CHECKLIST

Area	Class	O Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No
			cl	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes No N/A - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes No 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes No 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes No - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes No				NO SATELLITE ACCUMULATION

Area '	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.	
MAN	2		a	Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266. Section 722.142: Exception Reporting Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and	X		>	NONE REQUIRED	
	1	1	1		1		l _	1	

Ares .	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent bliance? No	Not Applicable	Remarks or Comment No.
ОТН	1		•	- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A Section 722.143: Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			<u> </u>	NONE REQUINED
s								

Area '	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1/2		•	PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No			×	NO EXPORTS
				Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				
<i>:</i>								

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
MAN	1		b1 b2	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Naste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; and Has the importer or his agent signed the manifest in place of the generator; and Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A Is the person importing hazardous waste using manifests obtained from the Agency? Yes No	Yeş	No	N N	NO IMPORTS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2	X	t.	PART 722 GENERATOR STANDARDS Subpart G: Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes No N/A - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes No N/A NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).		X	NO FARMINE

								· · · · · · · · · · · · · · · · · · ·	
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.	
отн	1		d	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes No	X			1	

Area			90 Day F/U	Key Ltr Sub	Requirement		parent pliance?	Applicable	Remarks or Comment No.
1			Req	Sec		Yeş	No	Not	
					PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				-
ОТН	1		Ì		Section 725.111: USEPA Identification Number	X			
					Has the facility obtained a USEPA identification number?				
ОТН	1	.	i		Section 725.112: Required Notices	X			
				a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				NO SUCH BRRANGEMENTS
ОТН	1				Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A Section 725.113: General Waste Analysis Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its	X			
					treatment, storage or disposal? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No				
			a 3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4)				
				indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A				
				Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A				
			b	Has the owner or operator developed a written analysis plan? Yes No NOTE: If "No", skip to 725.114.				÷ .
				Is the written waste analysis plan available at the facility? Yes No				

	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	oparent oliance?	Not Applicable	Remarks or Comment No.	
					Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No					- 1
				b	 Does the plan specify: The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes No					
					2) The test methods which will be used to test for those parameters? Yes No					
					3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				·	
					4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No					
					5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No					
;										

6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.	-
- \(\frac{725.293}{25.293} \) \(\text{Surface Impoundments} \); - \(725.375 \) \(\text{Suste Piles} \); - \(725.375 \) \(\text{Suste Piles} \); - \(725.373 \) \(\text{Land Treatment} \); - \(725.373 \) \(\text{Land Treatment} \); - \(725.475 \) \(\text{Thermal Treatment} \); - \(725.475 \) \(\text{Thermal Treatment} \); - \(725.502 \) \(\text{Chem. Phys. Bio. Treat.} \) \(\text{Yes} \sum \text{No} \) \(\text{N/A} \) NOTE: \(\text{Circle the specific waste management methods} \) \(\text{being employed.} \) c \(\text{For off-site facilities, does the plan:} \) 1) \(\text{Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? \(\text{Yes} \sum \text{No} \) \(\text{N/A} \) 2) \(\text{Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? \(\text{Yes} \sum \text{No} \) \(\text{N/A} \) OTH 1 \(\text{X} \) \(\text{Section 725.114: Security} \) Does the facility qualify for the exemption to the requirement to provide security provided in Section \(\text{725.114(a)?} \) \(\text{Yes} \sum \text{No} \sum \text{No} \sum \text{Yes} \) \(\text{No} \sum \text{Yes} \sum \text{No} \sum \text{Yes} \)	ОТН	1			additional analysis requirements for specific waste management methods as specified in Sections: -	Yes	No	O.Z.		

Area	Class	90 Day F/U	Key Ltr	Requirement		parent liance?	Applicable	Remarks or Comment No.
`		Req	Sub Sec		Yeş	No	Not ,	<u>,</u>
			b	Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No OR 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes No Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes No NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.			Z	

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Area		Class	90 Day	Key Ltr	Requirement ·	In App Compli		pplicat	Remarks or Comment No.
		ပ	F/U Req	Sub Sec		Yeş	No	Not A	·
ОТ	н	2			Section 725.115: General Inspection Requirements	X			
				a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				- *
					1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes No				
				a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No No				
				b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No				
				b2	Is the written schedule at the facility? Yes No				
				b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes No				
 				b4	Does the schedule specify at least the following minimum inspection frequency:				
					- Daily inspections of areas subject to spills? Yes No				
L			l						

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement .	pparent pliance? No	Not Applicable	Remarks or Comment No.
			c	- The items and frequencies, where applicable, called for in Sections: - 725.274 (Containers); - 725.326 (Surface Impoundments); - 725.477 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the applicable section. Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes No Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes No N/A Does the owner or operator record the results of inspections in a log or summary? Yes No The date and time of the inspection? Yes No The name of the inspector? Yes No The name of the inspector? Yes No			NO EVIDENCE OF SUCH

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-	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
	ОТН	2		al	- A notation of the observations made? Yes No	Yeş	No	Not A	NUNE NOTED OR PPRICENTLY NEEDED

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	oparent oliance? No	Not Applicable	Remarks or Comment No.
			C	B) Key parameters for automatic waste feed cutoff systems? Yes No N/A C) Communications or alarm systems? Yes No N/A D) Response to fire or explosion? Yes No N/A E) Response to ground water contamination incidents? Yes No N/A Does the program cover the implementation of the contingency plan? Yes No No Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A Has the facility conducted an annual review of the initial training? Yes No N/A Are the following documents and records being maintained			NOT A DISPUSAL EACILITY
ž.				at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No			. • • • • • • • • • • • • • • • • • • •

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90 Key Ltr Day F/U Sub Sec	Requirement	In App Complia	ance?	Not Applicabl	Remarks or Comment No.
above, or oth assign Yes	maintaining training records of former re involved in hazardous waste management at least three years? N/A General Requirements for Ignitable, Reactive or Incompatible Wastes and reactive wastes protected from and ources of ignition and reaction? d open flames restricted to specially when ignitable or reactive waste is	×			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
			a b	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No 4) Damage the structural integrity of the device or facility containing the waste? Yes No 5) Through other like means threaten human health or the nvironment? Yes No	Yeş	No	-	

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A NOTE: A "Yes" answer is a violation of the location standard.				LANDFORMS

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Area	Class	90 Day F/U	Key Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No.
		Req	Sec		Yeş	No	Not	
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				, -
нто	1	χ		Section 725.131: Maintenance and Operation of Facility	X		•	
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
				Air;Soil; orSurface water,				
ОТН	1	x		which would threaten human health or the environment? Yes No Section 725.132: Required Equipment	\prec			
0	1	^		occoron 720.2021 redailed equipment	-/-		1	
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	 An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A 				alam system
-			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No N/A				Telephone

-	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
	нтс	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No N/A - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes No N/A NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes No N/A - Fire protection equipment? Yes No N/A - Spill control equipment? Yes No N/A - Decontamination equipment? Yes No N/A NOTE: Any "N/A" answer must be explained in the Comments.	X			the skinguiders water strongertan pumps for Ching Borge Counce Borge Counce the plane daily alarm - tricemonthly fine skinguiders mappeted monthly

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Area	Class	90 Day F/U	Key Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No.
]	Req	Sec		Yeş	No	No t	
ОТН	1	χ		Section 725.134: Access to Communications or Alarm Systems	X		-	. •
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				
			b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes NO N/A				·
ОТН	1	х		Section 725.135: Required Aisle Space	\times			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
нто	2			Section 725.137: Arrangements with Local Authorities	X			
-			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

		r					<u> </u>	
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Appa Complia Yeş	ance?	Remarks or Co	omment No.
				1) Arrangements to familiarize police and departments and emergency response teams the layout of the facility, properties hazardous wastes handled at the facility associated hazards, places where person would normally be working, entrances to reinside the facility and possible evacuaroutes? Yes No N/A	with of and onel bads			
				2) Where more than one police or fire departs might respond to an emergency, has one designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A	been rity			
				3) Agreements with State emergency response tea emergency response contractors and equipout suppliers? Yes No N/A				
				4) Arrangements to familiarize local hosping with the properties of hazardous waste hand at the facility and the types of injuror illnesses which could result from fivexplosions or releases at the facility? Yes No N/A	dled ries			
			!	NOTE: Any "N/A" answer must be explain the Comments.	ined			
1.			b	Has the owner or operator documented, in the opera record, refusal of State or local authorities to einto any or all of the above arrangements? Yes No N/A			NO SUCH	
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	Area	Class	90 Day F/U	Key Ltr Sub	Requirement		parent liance?	Applicable	Remarks or Comment No.
j			Req	Sec		Yeş	No	ğ	
					PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				 -
	НТО	1			Section 725.151: Purpose and Implementation of Contingency Plan	X	·		
	!			a	Is a plan available? Yes No				
					NOTE: If the answer is "No", skip to 725.155.				
				а	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No				
				Ь	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A				
	ОТН	2			Section 725.152: Content of Contingency Plan	\times			
				a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
					1) Fires? Yes X No				
	-				2) Explosions? Yes No				
	:								

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
			c d d	3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No Does the plan describe the arrangements agreed to by: 1) Local police and fire departments? Yes No 2) Hospitals? Yes No 3) Contractors? Yes No 4) State and local emergency response teams? Yes No Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes No Is the list of emergency coordinators up-to-date? Yes No If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes No Does the plan identify: 1) A list and physical description of all emergency equipment at the facility? Yes No	·	No		Lemont Palice Cools Country Sherif! Silver Cross Hoopp. Polos Comm. Hosp.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance? No	Not Applicable	Remarks or Comment No.
отн	2	. 5.	a	725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever: 1) Applicable regulations are revised? Yes No	X			- -
			b c	2) The plan fails in an emergency? Yes No N/A 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				NOT FAILED IN AN ÉMÉRGENCY NO MAJOR DÉSIGN CHANGES
ОТН	2		d e	4) The list of emergency coordinators changes? Yes No 5) The list of emergency equipment changes? Yes No Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No	×			
5				163				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
отн :	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes No Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes No Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes No NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.	X			9/1/28 THE SHREDDER UNIT WAS ON FIRE AND CAUSED NEARBY OFF. SPEC CONSUMER ADDUCTS AWAITING SHREDDING TO ICHITE. CONTINUENCY PLAN WAS PUT INTO EFFECT WITHIN MINUTES. ALL NECESSAM AGENCIES WERE NOTIFIED. A REPORT WAS SUBMITTED TO IEPA.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting				• - . •
MAN	1			Section 725.171: Use of Manifest System	X			
				Does the facility accept waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
1				For each manifest reviewed, did the facility:				
			al	Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes No N/A N/A				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				
<u>-</u> -	-		a 5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
			b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? No N/A Does the facility initiate shipments of hazardous waste?				NO RAIL OR WATER SHIPMENTS
				NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.				
MAN	2			Section 725.172: Manifest Discrepancies NOTE: If there are no manifest discrepancies, mark	X			
			b	the "N/A" column. Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes No				
			đ	If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes No				
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Are	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Appa Complia Yeş		Remarks or Comment No.
отн	2	Req	a b	Section 725.173: Operating Record Does the owner or operator have a written operating record at the facility? Yes No Is the information in the operating record being maintained until closure of the facility? Yes No Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No	Yes	No .	
1, 2)				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes No 3) The location of each hazardous waste within the facility? Yes No 4) The quantity of each hazardous waste at each location within the facility? Yes No 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A			NOT A DISPOSAL FACILITY

90 Key Ltr Sub Requirement Requirement	Comp	parent liance?	Remarks or Comment No
6) A cross reference by manifest number to loca and quantity of hazardous waste? Yes No N/A 7) Records and results of waste analyses trial test performed as specified in Section - 725.113 (Gen. Waste Analysis)? Yes No N/A - 725.293 (Tanks)? Yes No N/A - 725.325 (Surface Improvements)? Yes No N/A - 725.352 (Waste Piles)? Yes No N/A - 725.373 (Land Treatment)? Yes No N/A - 725.441 (Incinerators)? Yes No N/A - 725.475 (Thermal Treatment)? Yes No N/A - 725.502 (Chem., Phys., Bio. Treatment)? Yes No N/A 8) Summary reports and details of all incid that require the implementation of the	and s:	No 2	NONE OF THESE UNITS

Area	Class	90 Day F/U Req	Key Ltr Sub		Requirement	Comp	parent pliance?	ot Applicable	Remarks or Comment No
₹ · · · · · · · · · · · · · · · · · · ·	נט		Sub Sec		Records and results of inspections as required by Section 725.115(d)? Yes No No NoTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action. Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes No N/A - 725.194 (G.W. Monitoring)? Yes No N/A - 725.376 (Land Treatment)? Yes No N/A - 725.378 (Land Treatment)? Yes No N/A - 725.447 (Incinerators)? Yes No N/A - 725.447 (Thermal Treatment)? Yes No N/A NOTE: Data required under 725.194 must be kept throughout the post-closure period.	Yes		Not Ap	N/A NOT A DISPOSAL FACILITY

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent lliance? No	Not Applicable	Remarks or Comment No.
отн	2			11) All closure cost estimates required by Section 725.242? Yes No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records	X			NOT A DISPOSAL
			С	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes No N/A - The local land authority? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A				NO UNRESOLVED ENFORCEMENT ACTION

			 -				6)	
Area	Class	90 Day F/U	Key Ltr	Requirement	In App Compli		Applicable	Remarks or Comment No
`		Req	Sub Sec		Yeş	No	Not A	
ОТН	2			Section 725.175: Annual Report	X			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				<u>.</u>
ОТН	1			Section 725.176: Unmanifested Waste Report	X			
		-		Does the facility accept hazardous waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No N A				NO HAZ WASTE ACCEPTED WITHOUT A MANIFEST
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
1,				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No				
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No
OTU	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No Section 725.177: Additional Reports			
ОТН	2		a	Has the owner or operator submitted to the Agency, as required, reports concerning: 1) Releases, fires, explosions as specified in			
			b	Section 725.156? Yes No N/A 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?			NOT A DISPOSAL
			С	Yes No N/A _X 3) Facility closure as specified in Section 725.215? Yes No N/A X			NOT UNDER COING
z.							
5							

Arsa	Cless	90 Day F/U Req	Key Ltr Sub Sec	/ Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				
CLO	1			Section 725.212: Closure Plan	X			
			a	Was the most current facility closure plan available during the inspection? Yes No				
				Was the closure plan submitted to the Agency within the time frames specified below:				NO CLUSURE AT
				At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) ex- pected to begin? Yes No N/A				
				At least 180 days prior to the date of final closure of a facility with surface impound- ment(s), waste pile(s), land treatment or landfill unit(s)? Yes No N/A				
				 At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes No N/A 				
				 At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes No N/A 				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance? No	Not Applicable	Remarks or Comment No.
CLO	1			 No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes No N/A No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes No N/A Section 725.218: Post-Closure Plan 			<u> </u>	NOT A DISPOSAL
FIN	1		a	Was the most current facility post-closure plan available during the inspection? Yes No Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes No N/A Section 725.242: Cost Estimate for Closure	×			PACILITY
				Has the facility prepared a written estimate of the cost of closing the facility? NOTE: If no closure plan, mark "N/A".				NOT A DISPOSAL
FIN	1			Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? NOTE: If no post-closure plan, mark "N/A".			X	NOT A DISPOSAL
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				 -
ОТН	1	х		Section 725.271: Condition of Containers	X			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
нто	1	Х		Section 725.272: Compatibility of Waste with Containers	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
ОТН	1	х		Section 725.273: Management of Containers	X			
			a	Are containers of hazardous waste always closed during storage? Yes No				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes No				
отн	2			Section 725.274: Inspections	X			
5				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes No				

 								
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	parent bliance?	Not Applicable	Remarks or Comment No.
				MOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
ОТН	1	X	:	Section 725.276: Special Requirements for Ignitable or Reactive Wastes	X			
				Are containers holding ignitable or reactive waste located at least 50 feet from the property line?				
ОТН	1	X		Section 725.277: Special Requirements for Incompatible Wastes				
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				
÷								
ŧ								

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems	·			
				Section 725.290: Applicability				
				Does the facility store or treat hazardous waste in tanks? Yes No				
				If "No", skip Subpart J.				
				NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.	:	i		
				Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No				
				NOTE: Failing the filter test means that the waste contains free liquids.		,		
ОТН	2			Section 725.291: Assessment of Existing Tank Systems	X			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No				
				NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				
	L							

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2		a	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.		χ	NO NEW TANKS
ē -				 hazardous characteristics of the waste; and evaluation of potential for corrosion and corrosion protection measures? Yes No 			

Area	Class	O Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No Section 725.293: Containment and Detection of Releases	×			
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				THESE WASTES NOT STIRED ON SITE
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				SECONDARY
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes No N/A or				PROVIDED FORALL TANKS -
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A				

Ares	Class	O Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
			b1 & 2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A N/A				. • -
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).				·
			с4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A	: : :			
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.				
			d	Does the secondary containment have one or more of the following:				
				 a liner (external to the tank); or 				
				2) (a vault) or				
				3) a double-walled tank; or				
				4) an equivalent device (approved by the Board)? Yes No N/A				
				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.				
				Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

Area	Class	O Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	oparent oliance? No	Not Applicable	Remarks or Comment No.
	-			 above ground piping (exclusive of flanges, joints, valves and connections) that are in- spected daily; 				<u>.</u>
				 welded flanges, joints and connections that are inspected daily; 				
				 sealless or magnetic coupling pumps that are inspected daily; and 				
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				NO UNDERGROUND TANKS
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A				
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A				
4, 1				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes No N/A			,	
				Tcn_1_E	<u> </u>			

Aree	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
ОТН	1	χ		Section 725.294: General Operating Requirements	X			-
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes No				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A				NO UNCOVERSO TANKS
			С	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A				NO KNONN LEAKS OR SPILLS
ОТН	2			Section 725.295: Inspections	X			
			С	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes No				
ОТН	1	X		Section 725.296: Response to Leaks or Spills and Dispo- sition of Tank Systems			X	NO APPARENT LEAK OR SPILLS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No				LEAK OR SPILLS
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp	In Apparent Compliance? Yes No		Remarks or Comment No.
				If a tank or secondary containment system has leaked, has the owner done the following:			Not	
			a	<pre>1) Ceased using, stopped inflow of wastes? Yes No</pre>				
			b	Removed the waste from the tank system within 4 hours and/or from the secondary containment system within 24 hours? Yes No				
				3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes No				
			đ	4) Reported to the Agency within 24 hours of detection? Yes No				
				NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was immediately contained and cleaned up was spilled.				
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No				
=			e4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No N/A				
				NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.				Y

Area	Class	IO Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No
CLO	1	Req	f a a	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after returning the tank system to use? Yes No N/A Section 725.297: Closure and Post Closure Care NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298. At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes No If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No NOTE: Such a tank system is considered a "Landfills and shall meet all of the requirements of landfills	Yeş	No	Not	NO CLOSURE
				specified in Subparts G and H.		i		

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No
отн	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes No	×			
			a	NOTE: If "No", skip to Section 725.299. If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No				
ОТН	1			Are there proper protective distances between the waste management area and the facility boundary line? Yes No			X	NUMPATIBLES NOT STORED OR TREATED IN SAME TANK SYSTEM

Are	Class	Day F/U Req	Key I tr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1		a b	Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner: 1) Conducted a waste analysis and trial treatment or storage tests? Yes No N/A or 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes No N/A NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.		X	CHEMICAL TREATMENT NOT OCCURING IN TANKS AT THIS TIME. WASTES IN TANKS ESSENTIALLY SIMILAR

Arca	٨	1 90 Day F/U	Key Ltr Sub-			ance?	<u> </u>	Remarks or Comment Numb
			sec	Part 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIFIC TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES	·			
·				Subpart D Hazardous Waste Burned For Energy Recovery Section 726.131 Prohibitions	$ $ \times			
				Is the person who markets hazardous waste fuel marketing it to only:			-	
٠.			a)	1) Persons who have notified of their hazardous waste fuel activities under Sec. 3010 of RCRA and who have obtained a USEPA identification number? Yes No		*** E ***		
• •	•		ь)	2) Persons who burn the fuel in boilers or industrial furnaces identified in Sec. 726.131 (b)? Yes No N/A_X				
			c)	Is the cement kiln which burns fuel which contains hazardous waste:				
		•		1) Outside the boundaries of any incorporated municipality with a population greater than 500,000? Yes No N/A 2) In compliance with the requirements of 35 Ill. Adm. Code 702, 703, 725 (724) applicable to incerators? Yes No N/A Note: If the answer to the first question				SYSTEC - INDIANA CONTINENTAL CEMENT- MISSOURI
				is "No", then for the facility to be in compliance, the answer to the second must be "Yes". If the answer to the first is "Yes", then the answer to the second could be "Yes", "No", or "N/A".				7

1 Vica	1	1	1 117		ا: ما		<u> </u>	Describe on Common Mail 1
1.		' Day F/U	Lix Sub-	Requirement	Comp.i.	Lauce? No	N/A	Remarks or Comment Number
	-		Sub- sec	Section 726.132 Standards Applicable To Generators of Hazardous Waste Fuel.				
				Is a generator of hazardous waste that is used as a fuel or used to produce a fuel in compliance with the requirements in 35 Ill. Adm. Code 722? Yes No				
				Note: Complete the generator portion of the inspection report before answering the above question. Generators who market hazardous waste fuels to burners are also subject to Sec. 726.134. Generators who	,			
٠.				are also burners are subject to 726.135.	,			
				Section 726.133 Standards Applicable To Transporters of Hazardous Waste Fuel.		183	X	NOT A TRANSPORTER
				Is the transporter of hazardous waste that is used as a fuel or used to produce a fuel in compliance with the requirements of 35 Ill. Adm. Code 723? Yes NoNo				
			·	Note: Complete the transporter portion of the inspection report before answering the above question.				
				Section 726.134 Standards Applicable To Marketers Of Hazardous Waste Fuels.	X			
-				Note: Prior to completing this section carefully review the definition of "marketers of hazardous waste fuels."				• •
				_				
 	_	_	<u> </u>	PEC-D-Z	.	_		<u> </u>

	النمنا .	90	j Key		 1 to: Am	párent		
Area	G	Day	Ltr	Requirement	Compl	lance?		Remarks or Comment Huma
		1-17-	Sub- sec	**************************************	Yes	llo	H/A	
				Is the marketer complying with the prohibitions in Section 726.131? Yes X				
			b)	llas the marketer specifically notified under Sec. 3010 of RCRA regarding his activities as a marketer of hazardous waste fuels? Yes No				
			c)	Is a marketer who also stores hazardous waste fuels in compliance with the applicable provisions of 35 Ill. Adm. Code 702, 703, 722.134, 725 (724) Subparts A thru L? Yes No N/A				
				Note: Complete the applicable TSD Sections of the inspection report before answering the above question.			j	
-			d)	If the marketer ships hazardous waste fuel off site is He complying with the standards for generators in 35 III. Adm. Code 722? Yes No N/A				
				Note: Complete the generator portion of the inspection report before answering the above question.				
	-		e)	Prior to receiving or making of hazardous waste fuel has the marketer received or provided the certification required in Sec. 726.134 (e)(1) or (2)? Yes No N/A				
÷			f)	Is the marketer maintaining the certifications received or rendered in the above question for a period of three years from the date the marketer last engages in				
				REC.D-7				6

1	Arca	2	90 Day	Key Ltr	Requirement		- parent lance?		Remarks or Comment Numbe
			F/U	Sub-	Vadattement	Yes		N/A	
-				sec	a hazardous waste fuel marketing transaction with the person who sends or receives the certification notice? Yes No N/A	,			
				·	Section 726.135 Standards Applicable To Burners Of Hazardous Waste Fuel			\geq	NOT A BURNER
					Note: Prior to completing this section, carefully review the definitions of industrial furnaces & boilers in 35 Ill. Adm. Code 720.110 & 35 Ill. Adm. Code 726.131.		• •		NOT A BURNER OF HAZARDOUS WASTE FUEL
	•			a)	Is the owner or operator of the industrial furnace or boiler complying with the prohibitions in Sec. 726.131? YesNo		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	•	
				b)	llas the owner or operator of the industrial furnace or boiler specifically notified of his activities as a burner of hazardous waste fuels under Sec. 3010 of RCRA? Yes No				
			•		Is the owner or operator of the industrial furnace or boiler who stores hazardous waste fuels in compliance with:				
		`.		c)1)	1) The requirements of 35 Ill. Adm. Code 722.134 for the short term accumulation of hazardous waste fuel on site? Yes No N/A	•			
	÷.		·.	c)2)	2) The requirements of 35 Ill. Adm. Code 725, Subparts A thru L for existing storage facilities? Yes No N/A				
					REC-1-4				7



ILL EPA - D'L.P.C.

DECENVED

March 22, 1989

Carol A. Graszer Environmental Protection Specialist 1701 South First Avenue Suite 600 Maywood, IL 60153

Dear Carol:

Enclosed are Continental Cement's and Systech Corp.'s "Notification of Hazardous Waste Activity" you requested.

If you need more information please call.

Sincerely

Paul A. Zajec

Plant Supervisor

PAZ/kn

Enc.

RECEIVED MAR 3 2 1949

ILL. E.P.A. - D.L.P.C. STATE OF ILLINOIS

RECEIVED

APR - 7 1989

IEPA-DLPC

PO Box 71

Hannibal, Missouri 63401

(314) 221-1740 Telex 434-308

February 13, 1907

FF 1 12 1987

Petrochem Services, Inc. P.O. Box 337 Lemont, IL. 60439

Dear Mr. Smith:

DECEIVED MAR 3 2 1989

This letter is to inform you that Continental CementAhaD.L.P.C. notified the United States Environmental Protection Agency under section 3010 of RCRA and that your fuel will be burned in a cement kiln.

Simcerely yours,

Dave Fox

Quality Control Superintedent

DLF:jm



NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested here is required by law, (Section 3010 of the Resource Conservation and Recovery Act).

ON OFFICIAL USE ONLY ASSESSMENT OF THE SECOND OF THE SECON
COMMENTS
INSTALLATION'S EPA I.D. NUMBER APPROVED (M. mo. & Hay)
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CONTINENTAL CEMENT COMPANY INC.
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CITY ON TOWN ST. ZIP CODE
TO HANNIBLAL MOG3401
IV. INSTALLATION CONTACT XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
JOB TITLE PHONE NO. (area sode & ma.)
2RICHARD ALTHEIDE, PLANT MANAGER 314 22 1 1740
OWNERSHIP THE CONTRACT OF THE PROPERTY OF THE
A. NAME OF HISTALLATION'S LEGAL OWNER
18CONTINENTAL CEMENT COMPANY INC.
11 B. TYPE OF OWNERSTIP [enter the oppropriate letter into box]
F - FEDERAL M
M - NON-FEDERAL M
VI. TYPE OF HASTE ACTIVITY (enter "X" in the appropriate box(es))
TT A. HAZARDOUS WASTE ACTIVITY IN B. WASTE-AS-FUEL ACTIVITIES WAR 3 2 1989
1 1. CENERATION II 6. CENERATOR MARKETING TO BURNER
1 1. GENERATION 1 6. GENERATION TO BURNER 1 1 6. GENERATION HASKETING TO BURNER 1 1 1. GENERATION TO BURNER 1 1 2. TRANSFORMATION 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
X 3. TREAT/STORE/DISPOSE
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TI 5. MARKET OR EURN HAZARDOUS WASTE FUELS (see Part B) 8. BURNER (see ITEM VII) RECT. JUL 1 0 1987
IXI Hazardous Waste Fuel
Used Oil Fuel
UTI. NASTE DIST BUENTNES MOD ON CHARLESTON DANGES AND THE STATE OF THE
VII. NASTE FULL BURNING: TYPE OF COMBUSTION DEVICE (Enter "X" in all appropriate boxes to indicate types of combustion device(s) in which hazardous waste fuel
or used oil full is burned. See instructions for definitions of waste fulls
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A. HAZARDOUS WASTE weste from non—specific	e sources your installation	handles. Use additional	sheets if uscerming.	140 CFR PIR 281.J1 IA	tuomatan beigu nees
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specific industrial source	s FROM SPECIFIC SOUR	ices, enter the four-di	git number from 40 CF if necessary.	Il Pari 201,32 for each i	isted hazardous weste from
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XI CERTIFICATION			EXPERIMENTAL		
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		Frank	Stevens,	Président	2/3/86

EPA Form 8700-12 (8-80) REVERSE

BILLING CODE 6540-60-C

BORGOOK CHITECAL COCCE

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VII. MODE OF TRANSF	ORTATION (transporte	ers only - enter "X"	in the appropriate	barjeji Salatist	
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				C. INSTAL	LATION'S EPA 1.D. HO.
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C. COMMERCIAL CHEMIC. nance your Installation his	AL PRODUCT HAZARDO andles which may be a haza	US WASTES. Enter the	four—digit number to lonal sheats if necessar	rum 40 CFR Part 261,3; V-	for each chamical sub-
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XI CERTIFICATION		可加速的影響	AND THE STATE OF T		004 - 0017)
I certify under penalty attached documents, an I believe that the submi mitting felse information	d that bused on my inc itted information is true	juiry of those indivi e, accurate, and com	duuls knmedlately (plete, I on oware (responsible for absali	ning the information.
BIGNATURE	·	HAME OFFICE	ופלפילעניון ברוצי עים	(int)	DATE SIGNED .
		Frank C	Stevens,	President	2/3/86

EPA Form 9700-12 (0-80) REVENSE

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VII. MODE OF TI	ANSPORTATION (Hunspu	rices only - enter "J	" in the appropriate	box(es))	uzera erezenia
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X. DESCRIPTION	N OF HAZARDOUS WAST	ES (continued from	(tone)		ANGENTE DESCRIPTION
A. HAZARDOUS WA	ASTES FROM NON-EPECIFIC pecific sources your Installation	SOURCES, Enter the handles. Use additional	four-digit number from il sheets if necessary.	40 CFR Part 261.31 lo	r each listed hezerdous
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7		•	19	11	""
DOO	5 DOO6	D 0 0 7	D O O 8	D 0 0 9	
B. HAZARDOUS WA specifie Industrial	STES FROM SPECIFIC SOUR sources your installation handle	CES. Enter the four-d s. Use additional sheets	igh number from 40 CF. If necessary,	R Part 261,32 for each l	isted hazardous weste from
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19	10	21	2.2	2.3	24
K 0 9	5 KO96				
2.5	24	17	28	20	30
C. COMMERCIAL C stance your install	HEMICAL PRODUCT HAZARI ation handles which may be a h	DOUS WASTES, Enter azardow wasta, Usa ad	the four-slight number the four-slight number the distinct sheets if necessaring the slight necessaring the slight necessaring the slight necessaring the slight necessaring the slight necessaring the slight number the slight num	rum 40 CFR Part 261,3 'Y-	3 for each dismissi sub-
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37	31	33	40	41	42
<u> </u>	5 0051	<u>u052</u>	U 0 5 5	0 0 5 6	U 0 5 7
43		45	40	-47	
	9 080	n 0 8 8	U 0 9 2	U102	1110
hospitels, medical	OUS WASTES. Enter the four- and research leboratories your l	-digit number from 40 t nstallation handles. Use	OFR Part 201.34 for ead additional sheets if nec	n fisted hazardous waste	from hospitals, veterinary
	ICS OF NON-LISTED HAZAF your Installation handing. (See 4			pneding to the cherects	ristics of non-listed
⊠ 1. 16 (D001)	NITABLE [DU]z. connosive ezj	☐3. #EACT		[]4, YOXIC 1004 - 0017]
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attached docume. I believe that the	enalty of law that I have paits, and thei based on my submitted information is to mation, including the postion	inquiry of those indi rue, accurate, and co	and ein familiar with ividuals inmediately omplete. I am aware	responsible for abtai	ining the information.
RIGNATURE		HAME HOFF	CIAL TITLE STATE OF ME	rint)	DATE SIGNED .
		Frank	C. Stevens,	مر President	2/3/86

EPA Form 8700-12 (0-80) REVENSE

41.4

DOUTON WITHOUT COOK WITH



SYSTEMS TECHNOLOGY CORPORATION

245 North Valley Road Xenia, Ohio 45385 Area Code 513/372-8077 Dayton Toll Free 429-2533



ILL. E.P.A. - D.L.P.C. STATE OF ILLINOIS

SEPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

OHDDDSD48947

CEBERAL PORTLAND INC PADEDING PLATT
PO BOX 109
PADEDING ON 45879

INSTALLATION ADDRESS PO BOX 109
PAULDING OR 45879

EPA Form 8700-12A (4-90)

SYSTEMS TECHNOLOGY CORPORATION

JASEPH J. Microsymaki

Joseph J. Durczynski

Project Coordinator

Subsidiary of Systems Research Laboratories, Inc.

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CC. TINUE ON REVER

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Attach to this application a topographic map of the area extending the outline of the facility, the location of each of its existing an treatment, storage, or disposal facilities, and each well where it water bodies in the map area. See instructions for precise requirements.	id proposed in: injects fluids u	take and discharge attenderground. Include	ructures, each of its all springs, rivers as	hezardous waste
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U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Parmits Program (This information is required under Section 2005 of RCRA.)

L. EPA LD. NUMBER FIND006419212

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CONTINUE ON REVERSE

	ES (continued)		The state of the s		C. T. SOTT		Wester.	
C. SPACE FOR INCLUDE BE	ADDITIONAL PR LSIGN CAPACITY	CCSS CODES OR	FOR DESCRIBING	OTHER PROCE	\$255 (code "TO4")	. For each pr	OCES ENTE	
T04:	PRELIMINAL	E RICEIVED A RY ANALYSIS CERVING TANK	AND SCREENI	NG, CONTEN	T OF TANKER	IS PURPED		

OF SIX RECEIVING TANKS (30,000 GALLON CAPACITY EACH). TO INSURE UNIFORMITY OF BTU VALUE AND CHEMISTRY FOR CEMENT RAW MIX. CONTENT OF RECEIVING TANKS IS TRANSFERRED AS NEEDED TO THE FEED TANK. THIS FEED TANK (150,000 GALLON CAPACITY) SUPPLIES SUPPLEMENTAL FUEL TO FIRE THE ROTARY KILN.

IV. I	DESCA	MOTTE	OF HAZ	ARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Support O for each listed nationally waste you will nandle, if you handle hezardous westes which are not listed in 40 CFR, Subpart D, enter the four-digit number/si from 40 CFR, Subpart C that describes the characteries ties and/or the toxic contaminants of those hazardous wastes, والمراجع المهمون المحافظي الموكسية لأسميك والإخابات
- 8. ESTIMATED ANNUAL CUANTITY For each listed weste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For sean characteristic or toxic contaminant entered in column A estimate the total arrival quantity of all the non-firted vestald that will be handled 1 p. which possess that characteristic or conteminant.
- C. UNIT OF MEASURE For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the apprepriate codes are:

NGUSHAMALUE REPRESE	NECTED BY TOTHER THE CODE
OURS	MILDERANT
PONS	MET TENS.

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For fixed hazardous weste: For each listed hazardous weste entered in column A select the code/of from the list of process codes contained in Item III. to indicate now the wests will be stored, treeted, and/or disposed of at the facility.

For ton-listed necessary was as for each characteristic or toxic contaminent entered in column A, salect the codels from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hezardous wastes that possess. that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Einter the first three as described above; (2) Einter "CCO" in the expreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional expelsi-

2. PROCESS DEECRIFTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTES NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HEZERIOUS NUMBER -- HE more than one EPA Hazardous Wasta Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Weste Numbers and enter it in galumn A. On the same line complete calumns 8.C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Wassa Number that can be used to describe the wasta. In column 0(2) on that line enter "Included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Weste Number that can be used to describe the hazardous wants.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and discoss of an estimated 900 pounds i per year of chrome snavings from leather tanning and finishing operation. In addition, the facility will treat and discose of three non-listic wester. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each weste. The other weste is corrosive and ignitible and there will be an estimated of the sounds per year of each weste. 100 pounds per year of that waste, Treatment will be in an incinerator and disposal will be in a landfill.

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LINE NO.	H	AS HIGH	TE	N M	0	B. ESTIMATED ANNUAL OUARTITO OF WASTE	. 3	en i	5				1.	PR	96	E E	5 C	206	3			3. PROCESS DESCRIPTION (If a code is not entered in D(1))
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£PA Ferm 3510-3 (6-80)

THE RESERVE

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: E	etrochem S	services	Inc. (Herit	age Environmental Sucs.	
U.S. EPA I.D	. No.:		- (0311)	620007)	
Street:	Stophen:	Street (Caral Bank	Rd Northeast)	
City:	emont st	ate: <u>I</u> (Zi _i	Code: 60639	
Telephone:	(312)73	9-1150	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
Operator:	strochem So	rvices Inc	C. (Horitago	Environmontal Sucs)
Street:	Stephen St	/ ~	•	-Northeast)	
City:	emont st	ate: <u>F</u> L	Zi	Code: <u>60639</u>	
Telephone:	(312) 73	7-1150	 		
Owner:	netropoli-	tan Sa	nitary Distr	ict of Greater Chic	aj
Street:		Erie St	•	·	,
City:	—— — 、	ate:	Zi _j	Code: 604//	
Telephone:	(312)67	5-8099	·		
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Inspection	Name	w <u>م30، یا: ۱</u> Affiliation		35° DRY	
Inspection Inspectors:	Name Corol A. (Affiliation	Tel 1EPA (31	ephone 2) 345-9480	
	Name Corol A. (Michelle Under Michelle Under Michelle Refo	Affiliation DIBSLEY TWOOD	Tel 1EPA (31 1EPA "	ephone	
	Name Corol A. (Michelle Under Michelle Retz Lavra Tivar	Affiliation DIBSLEY TWOOD	Tel 1EPA (31	ephone 2) 345-9780	
Inspectors:	Name Corol A. (Michelle Under Michelle Retz Lavra Tivar	Affiliation Columnia Col	Tellera (31 1EPA (1 1EPA "	ephone 2) 345-9780	
Inspectors:	Name Corol A. (Michelle Under Michelle Retz Lavra Tivar	Affiliation OCESCEN COURT Claff es	Tellera (31 1EPA (1 1EPA "	ephone 2) 345-9780	
Inspectors:	Name Corol A. (Michelle Unde Mark Reform Lavra Tovar resentatives:	Affiliation Orasier	Tellera (31 1EPA " 1EPA " 1EPA " 1EPA " LDR Status	ephone 2) 345-9780	
Inspectors: Facility Repr	Name Corol A. (Michelle Unde Mark Reform Lavra Tovar resentatives:	Affiliation Orasier	Tellera (31 1EPA " 1EPA " 1EPA " 1EPA " LDR Status	ephone 2) 345-9780	
Inspectors: Facility Repr	Name Corol A. (Michelle Unde Mark Reform Lavra Tovar resentatives:	Affiliation Orasier	Tellera (31 1EPA " 1EPA " 1EPA " 1EPA " LDR Status	ephone 2) 345-9780	
Inspectors: Facility Repr Generator Transporter	Name Corol A. (Michelle Unde Mark Reform Lavra Tovar resentatives:	Affiliation Orasier	Tellera (31 1EPA " 1EPA " 1EPA " 1EPA " LDR Status	ephone 2) 345-9780	

INSPECTION SUMMARY

APPARENT LAND BAN VIOLATIONS

- Storage facility is not maintaining a copy of all land disposal restriction notifications from generators in their operating record.
- Treatment facility is not maintaining a copy of all land disposal restriction notifications from generators in their operating record.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

				Gen.	Treat	Store	Disp.	Trans.
Α.	F-So	lvent Wast	es .					
	1.	F001						
	2.	F002		X	X	$\underline{\times}$		
	3.	F003		X	<u> </u>	\times		
	4.	F004						
	5.	F005		\angle	\underline{X}	X		
		Note:	Use Appendix misclassifying			ther the fa	cility is	

B. California List Wastes

N/A

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

Revised 9-26-88

C. First Third Wastes

Note: (1)

(1) The detailed description for waste codes are listed in Appendix C.

(2) EPA has promulgated the treatment standards for the following waste code with *.

Gen. Treat Store	Disp.	Trans.
. } ∕A F006*		
N/A F006°		
F008		
F009		
F019		
K001*		
K004*		
K008*		
K011		
K013		
K014		
K015°		
K016*		
K017		
K017		
K019*		
K020*		
K021°		
K022*		
K024*	 -	
K025*		
K030*		
K031		
· K035		
К036*		
K037*		
K044*		
K045*		
W K046*		

5

	Gen.	Treat	Store	Disp.	Trans.
K047*					
K048*					
K049*					4
K050*					
K051*					
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001		*****			
P004					
P005					
P010					
. P011					
-					
P012					
P015					
P016					
P018					

NIA

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059			\rightarrow		
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120	*********				
P122					
P123					
U007					
U009			*******		

	Gen.	Treat	Store	Disp.	Trans.
U010					
U012					,
U016					
U018					
U019			\overline{X}		
U022			_4_		
U029				~	
U031			$\overline{}$		
			★		
U036			4		
U037					
U041					
U043			~~		
U044			\overline{X}		
U046					
U050					
U051					
U053					
U061	$\stackrel{\sim}{\rightarrow}$		$\overline{\lambda}$		
U063		-	******		
U064					
U066					
U067					
U074					مرند کارورین کیور
U077		-			
U078		•			
U086					
U089					
U103					
U105					
U108					
U115			$\overline{\mathbb{X}}$		
U122			X		
U124			/		
_					

	Gen.	Treat	Store	Disp.	Trans.
U129					
U130					
U133					
U134					
U137					<u></u>
U151					
U154			\overline{X}		
U155	-				
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211			$\overline{\times}$		
U219			\Rightarrow		 _
U220			\overline{X}		
U221					
U223					
U226					
U227					
-U228					
U237					
U238					
U248					
U249					
					

RCRA LAND DISPOSAL RESTRICTION INSPECTION GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

BD/	AT Treatability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, check the appropriate treatability group.
	Wastewaters containing solvents (less than or equal to 1% TOC by weight)
	Pharmaceutical wastewater containing
	spent methylene chloride All other spent solvent wastes
	An other spent solvent wastes
2.	California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?
	the appropriate treatment standard of the waster
	a. For liquid hazardous waste that contains PCBs at
	concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with
	existing TSCA thermal treatment regulations for
	burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	Yes No NA
	If yes, specify the method:
	b. For liquid hazardous waste that contains PCBs at
	concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other
	approved alternate methods (40 CFR 761. 60 (e))?
	Yes No NA
	If yes, specify the method and state whether the facility has submitted a written request to the Regional
•	Administrator or Assistant Administrator for an
/	exemption from the incineration requirement:
	1.

	3.	First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?				
		No NA				
		If yes, check the appropriate treatability group.				
		Wastewater (less than 1% TOC by weight and less than 1% filterable solids) Nonwastewaters				
		List the waste code and check the correct treatment standard group.				
		Waste Code Wastewater Nonwastewater				
		All first 3rd wastes storal + generated				
		All first 3rd wastes storal + generated by facility is non-wastewater				
В.	Wasi	e Analysis				
	1.	F-Solvent Wastes				
		a. Does the generator determine whether the F-solvent waste exceeds treatment standards?				
		Yes No NA				
		How was this determination made?				
		- Knowledge of waste				
		No				
		If yes, is any supporting data available for review? Describe how this is adequate.				
-	.	- TCLP Yes No				
		If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.				

U	treatment standards upon generation [268.7(a)(2)]?
	Yes No NA
	If yes, specify the waste stream: <u>F003, F005</u>
c	
	Yes No NA
d	How does the generator test F-solvent waste when a process or waste stream changes? Exercy chipment coming in a going of the coming in the co
2. (California List Wastes
NA	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
1	Yes No NA
t	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
	Yes No NA
	What type of absorbent is used?
	Check the types of waste to which absorbent is added.
	Liquid hazardous waste having a pH less than or equal to 2
	Liquid hazardous waste containing metals
	Liquid hazardous waste containing free cyanides
	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
V	- Knowledge of wastes
	Yes No NA

	- If yes, list test method used and constituent and concentrati levels that exceeded prohibition levels:
e.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
	Yes No NA
Fir	st Third Wastes:
a.	Does the generator correctly determine the appropriate treatment standard of the waste?
	Yes No NA
	Note: The treatment standards for first third wastes are given in Appendix D.
b.	Does the generator determine whether the First Third waste excertreatment standards upon generation?
	Yes No Soft hamme
	If yes, specify the waste stream: UOG

		- TCLP
		Yes No NA
		- Total Constituent Analysis
		Yes No NA
		Provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	c.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
		Yes No NA
	d.	How does the generator test the waste when a process or waste stream changes?
		On site lab
. <u>M</u>	anagem	<u>nent</u>
1.	On-	Site Management
	Is r	estrict waste or waste that exceeds the treatment standards ited, stored, or disposed on-site?
		Yes No
	If y	ves, the TSD Checklist must be completed.
2.		-Site Management
•	a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
	-	Yes No
	b.	Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
		Yes No

	c.	Does notification contain the following?
		EPA Hazardous waste number(s) Yes No
		Applicable treatment standards Yes No
		Manifest number Yes No
		Waste analysis data, if available Yes No
		Identify off-site treatment or storage facilities: Sy Stecin. hd,
in OFF	d.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
No		Yes No
NO OFF SITE DISPOSE	c.	Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
		Yes No
	f.	Does notification contain the following?
		EPA Hazardous waste number(s) Yes No
		Applicable treatment standards Yes No
		Manifest number Yes No
		Waste analysis data, if available Yes No
		Certification that the waste meets treatment standards Yes No
! !		Identify off-site land disposal facilities:
<u>.</u>	g.	Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?
•		Yes No NA
	h.	If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?
		Yes No

	i.	If yes, does the notification contain the	following inform	nation?
		EPA Hazardous waste number	Yes	No
		The corresponding treatment standards and all applicable prohibitions	Yes	No
		Manifest number	Yes	No
		Waste analysis data, if available	Yes	No
		Date the waste is subject to the prohibitions	Yes	No
	j.	Does the generator retain copies of all na period of 5 years?		
			X Yes	No
D.	<u>Demonstra</u>	ation and Certification "Soft Hammer"	Wastes	
	a.	Has the generator attempted to locate an and recovery facilities that provide trea greatest environmental benefit [268.8(a)(tment that yields	
16		2 (B-2	Yes	No
<i>L</i> ,	b.	Has the generator submitted to the Region demonstration and certification contains to document its efforts to locate practical	ng the following	information
		A list of facilities and facility officials contacted?	Yes	No
		Addresses	Yes	No
		Telephone Numbers	Yes	No
		Contact dates	Yes	No
		Attach a copy of the demonstration	and certification	n
	C.	If the generator has determined that the treatment for its wastes, has it sent docu demonstrating why it was not able to ob for the waste?	mentation to EP tain treatment or	A
		Yes No		
\forall		If yes, attach a copy of written discussion	on.	

	d.	Does th	ne generator ship his wa	ste off-site f	or treatment?	?
-			Yes	_ No		
		Describ	e the type of treatment	and treatme	nt facilities	
7						
	c.		e generator send a copy receiving facility with (
			Yes	No		
	f.		ne generator provide cer nt of wastes?	tification wi	th each subsc	quent
			Yes	No		
	g.		ne generator provide the ng facility with each sh			the
		(i)	EPA Hazardous was	ste number _	Yes	No
		(ii)	Manifest number	-	Yes	No
		(iii)	Waste analysis data, if available		Yes	No
	h.		ne generator retain copications for a period of		ces, demonstr	ations, and
			Yes	No		
E.	(i.c., boile	ers, furna	RCRA 264/265 Exempt aces, distillation units, velementary neutralization	wastewater	cesses	
	Are und	treatmei er RCRA	nt residuals generated f . 264/265? Yes	rom units or	processes exe	mpt
(If y	es, list ty	pes of waste treatment		ocesses:	
<i>/</i> .						

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A.

<u>Ger</u>	eral_	Facility Standar	<u>ds</u>											
1.	Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?													
	o I	F-solvent	<u>×</u> Ye	:5		No		NA						
		California List					•	NA						
	o I	First Third	<u> </u>	es		No		NA						
2.		es the facility ob stes and residues		sentativ	ve chen	nical and	physic	al analyse	s of					
			<u>X</u> Y											
	a.	What date was	the waste	analys	sis plan	last rev	ised? _	11-8-1	8					
	b.	Are analyses of												
								Off-site						
		Identify off-si Prior +	te lab:	Jener y Sis	rato)aste	ting	red to	i MeD					
	c.	Is F-solvent w			_									
			Y	es	\times	No		NA						
	d.	Is First Third appropriate for constituent an stabilization/f	or the object alysis for c	ctive of destruc	f the spation te	ecified l	BDAT ((i.c., total	is					
			Ye	es	\times	No		NA						
•	-	con	appropria stituent) fo idards are	or first	third	wastes w			tment					
	c.	Describe the f	requency of	of same	oling: 	Each	h sh	I pres	prontes					

	3.	Are the operating records, including analyses and quantities, complete [264.73/265.73]?
		Yes No
В.	Sto	rage (268.50)
	1.	Are restricted wastes stored on-site?
		No
		If no, go to C, Treatment.
	2.	If yes, check the appropriate method.
		Tanks Containers
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
		No NA
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage? Yes No
		103
	5.	Do operating records agree with container labeling?
		Yes No NA
	6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?
		Yes No

7.	Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?									
	Yes No NA									
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? Yes No									
	If yes, state how:									
	If yes, state now.									
8.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?									
	No NA									
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?									
	× Yes No									
9.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating									
	record? Yes No NA									
										
Tre	atment									
1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No									
•	If no, go to D, Treatment in Surface Impoundments.									

C.

2.	Heat treatment using either internal
	Steam coik or by Circulation to facilitate superation
3.	Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?
	Yes No
4.	Is dilution used as a substitute for treatment?
	Yes No
6.	Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?
	YesNo
7.	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
NO 51 TE	Yes NA NA
OCC PISA.	If yes, does the treatment facility provide notification and certification to the disposal facility?
	Yes No
	If yes, does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
	Identify off-site disposal facilities:
-	

	8.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
		Yes No NA
		If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
		Yes No
D.	Tre	atment in Surface Impoundments
NA	1.	Are restricted wastes placed in surface impoundments for treatment?
0).		Yes No
		If no, go to E, Land Disposal.
	2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
		Yes No
	3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
		Yes No NA
	4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
		Yes No
		Attach test results.
	5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?
		Yes No

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY INSPECTION REPORT

-USEPA Number: 031162000	7
Facility Name: PETROCHEM SERVICES INCHERIDAGE ENVIRONMENTAL SERV	KES INC.)
Street: ONE STEPHEN STREET (NE CANAL BANK RIAD) City: LEMONT Telephone: (312) 739-11 County: COOK State: FL ZipCode: 60439	50
Type of Facility: Notified as: G/TS/TR Regulated as: G/TS/TR LDF? HPV? 90 Day Follow-up required? Yes: No:	
Region: MATWOOD Date of Inspection From: 9:45an to: /. Weather (LDF Only): 65° SUNNY	30pm
Type of Inspection ISS: Sampling: Citizen Complaint: Closed: Other: Record Review: Follow-up to Inspection of: Withdrawal:	<u>-</u>
Non Regulated Status SQG: Claimed Nonhandler: Other (Specify in Narrative):	190 93 (
Notification date, $\frac{7-19-70}{7}$, from (initial) or (subsequent)	
Notification date, $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date, $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) or (subsequent) Notification date: $\frac{9-19-30}{19-30}$, from (initial) date: $\frac{9-19-30}{19-30}$, from (initial) date: $\frac{9-19-30}{19-30}$, from	
Part B Permit Application Part B Permit called by (US) (IL) EPA on: 5-6-8 Permit Due: 18-8 Part B Permit Submitted: 11-10-8 Draft Permit Issued:)-88
Enforcement Has the firm been referred to: USEPA? Y IAG? — County SA? —	
Date(s) of initial referral: 4-1-85	_ _
TSD Facility Activity Summary	00T 0 4

Activity By Process Code	On Pt A?	Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.		q 9 S	ual ort	
501	Yes	No	Yas	No	Yes	No	Y	7	Y	
S02	Yes	λ_{0}	Yes	\sim	Yes	No	N	Y	Y	
503	Yes	\sim \sim	N_{o}	No	No	No	N	N	2	
TOI	Yes	\sim \sim	Yes	N_0	Yos	No	Y	Y	Y	
T04	Yes	λ_{μ}	Yas	N_o	No	$\lambda 0$	у	Y	$ \omega $	

OPERATE: Heritage Environn	nental So	rvices Inc.	Tele	epare j:	(312) 735	9-115.	
: Strage: One Stephen St	reet (UE Canal	Bank	Roo	(d)		
		Stare: IL					
Owner: Water Rodanation					•	- 70s	
Street: 100 East Erie				•			
		State: J.L	_ Zip Ca	će:(06/1		
Person Interviewed		Title			lephone #		
Paul Zajoc	·	Plant Force	enan	(.	(312) 7-39-115		
							
		4					
							
Inspection Participants	•	Agency/Title		Te:	lephone /		
Carol Graszer		IEPA /EP	25)345-977	'O	
RON BROWN		USEPA/RURA					
Jim FINN		USEPA/SPERY				_	
				- Table			
Prepared By		Agency/Title		Tel	Lephone d		
Carol Graszer		IEPA/EP	۲,		345-91	270	
					<u></u>		
	ry of Appar	ent Violations	ATe2	l Class	Section		
OTH II 125.115a		1				¹	
OTH II 725.1156							
OTH I 725.135							
OTH II 125.274							
07H I 726.134c							
				1			

AMA CHARACH EVILLE

Facility Name: Heritage Environmental Services be. USEPA #: ILD 085349264 IBPA #: 031/620007

in and its and and	······································	HAZ	ARC	0005	11	1A57	E					
Waste Name (Include haz & hon-haz special) k waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Waste	On 8700 -12 *	On 3510 -3		Annu t. f	or	on	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
Hazardous Waste Fue (Secondary rull Blending	9-15-89	0001 F003 F005	7	Y	y	4	Y	44,016 gal	500,000 GALS PEIL YEAR	9-15-89	BURNEO IN A CEMENT KILN IN INDIANA: SYSTEC
Hazardous Waste Fuel	Secondary Ful Blending	621-89	1001 F003 F005	γ	γ	У	γ	γ	SAME AS ABOVE	SAME	6-21-89	BURNED IN A CEMENT KIKNIN misouri: Continent
WATER	WASTE WATER FROM TREATMENT UF HAZARDOUS WASTE	9-7-85	D001	1	Y	γ	Y	Y	14, 355	13- 20,000 CALS PERL YEAR	9-7-89	HERITAGE IN INDIANA KON DEWATERING
USED OIL AND OIL/WATER MIXTURES	BROUGHT FROM OFF-SITE UNADLE TO TREAT ON- SITE	9-7-89	0008	7	ť	7	7	γ	14, 4:4 gue	GALS PERR	9-7.8	SENT TO HES IN INDIANA FOR TREATMENT
TOX-AWAY WASTES	HOUSEHOLD HAZ. WASTE COLLECTION IN INDIANAPOLIS LAB - PACKED	TEMP. STURAGE LAD-PACK	VARIE	7	Y	Y	γ	7	NONE	NO CONGET GENERATE		
NAPTHA	GARAGE		Dool	Y	Y	γ	γ	У		30 GALS MOUTHLY	8-30-	SAPOTY KLEEN FOR Reclamation
WASTE FLAMMABLE SOLIDS	SPILL PADS (RUM CLEANUPS FROM ERU ANA IN SVEPL, FUEL PROD.	`I	(1003)	Y	Y	Y	Y	Y	DOUMS		8-1 89	INCINERATION
FLAMMABLE SULIDS	STRAINER CLEIDNINGS IN SECONDIANY TUEL BLENDING PROCESS	7-23-7	F005	Y	γ	Y	4	4	same as abore	LEW 14	_	RUCCINS ENVIRONMENTAL LOUISANA
SOU JS	SAME AS PROVE	6-5-8	FU03 FU03		У	Y	\ \	4	as above	SIMIE AS ABOVE	6-5-8	ROSS IN OHIO
T												

^{*} Ali "N responses must be explained in the narrative.

NON-HAZARDOUS WASTES

	1 0/4	- HAS	ARI	005	ω	2554	ک					
Waste Name Include haz & non-haz special k waste for which no deter- mination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Haste	18700	On 3510 -3	RP	Annua t. fo	al or =	Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
DRUMS	MCRA EMPTY METAL CONTAIN GRS			NA					cess than 1000	6 LOAD PER YUAR	720	LANDFILLED AT CID,#2
Solios	NON-NAZ TANK BOTTOMS/ERUZOILS FROM CLEANUPS			NA					ivoire	VAKIES	8/14/87	LANDFILLED AT CID #2
WASTE	NON-142 LOADS NOT SEPARATED				NF				10 Drums	goliper year	187	HES IN INDIANAPOLIS FUR TRATMENT
TREATME OF WATER	RAIN WATER/ WATER SLPARATER FRAM DIL STREAMS				NA				14,389 gel	10,000 golopi- ylar	9/1/19	NES IN INDIANAPOLIS FOR TREATMENT
anna a paramana								-				
			-				1.00 0.00 12	•				
····································						-	<u>-</u>					
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^{*} All "No" sponses must be explained in the narrative.

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NARRATIVE

IEPA-DLPC

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production

HAZARDOUS WASTES GENERATED

- Note #1 Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.
- Hazardous Waste Fuel D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns. At the time of the inspection the fuel was being sold exclusively to Systec in Indiana. The last shipment was 9/15/89. The last shipment to Continental Cement in Missouri was 6/21/89. Approximately 500,000 gallons are generated yearly. There were 46,016 gallons on site.
- Low Flash Water D001. Waste water separated from hazardous waste. This waste was formerly sent to Century Resources for de-watering and is now sent to HES in Indiana. The last shipment was 9/7/89. Approximately 15,000-20,000 gallons are generated annually. There were 14,355 gallons on site.
- Used Oil and Oil/Water Mixtures D008. Waste brought on-site from off-site that the facility was unable to treat. The last manifested shipment was on 9/7/89 and went to HES in Indiana. There were 14,454 gallons on site.
- Waste Flammable Solids F003, D008. Spill pads from emergency cleanups and solids from supplemental fuel production. The rate of generation varies. The last manifested shipment was 8/7/89 and went to CWM in Chicago for incineration. There were 209 drums on site.

- Flammable Solids F002, F003, F005. Generated during strainer cleaning in the secondary fuel blending process. 25-50 drums are generated yearly. The waste was formerly sent to ROSS Incinerator in Ohio with the last shipment being 6/5/89. Presently HES is using Rollins Environmental incinerator in Louisiana. The last manifested shipment was 7/23/89. The amount on site is included with the above waste stream.
- Waste Petroleum Naphtha D001. Generated in a parts cleaner in the maintenance garage, 30 gallons are generated monthly. The last manifested shipment was 8/30/89 and went to Safety Kleen for reclamation.

NON-HAZARDOUS WASTE GENERATED

- Crushed Drums RCRA empty 55 gallon drums. Six loads are generated yearly. The last manifested shipment was 7/20/89 and was sent to CID #2 for landfilling. There was less than one load on site.
- <u>Solids</u> Non-hazardous tank bottoms and soil from remediation activities. The rate of generation varies. The last manifested shipment was landfilled at CID #2 on 8/18/89. There weren't any solids on site.
- Waste Oil Non-hazardous loads that were not gravity separated.

 Approximately 75,000 gallons are generated per year. The last manifested shipment was 8/14/89 and went to HES in Indianapolis for treatment. There were ten drums on site.
- Treatment Water Rain water and water separated from non-hazardous oil streams. Approximately 100,000 gallons are generated yearly. The last manifested shipment was 9/7/89 and went to HES in Indiana for treatment. There 16,389 gallons on site.

HAZARDOUS WASTE UNITS

Sol - Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

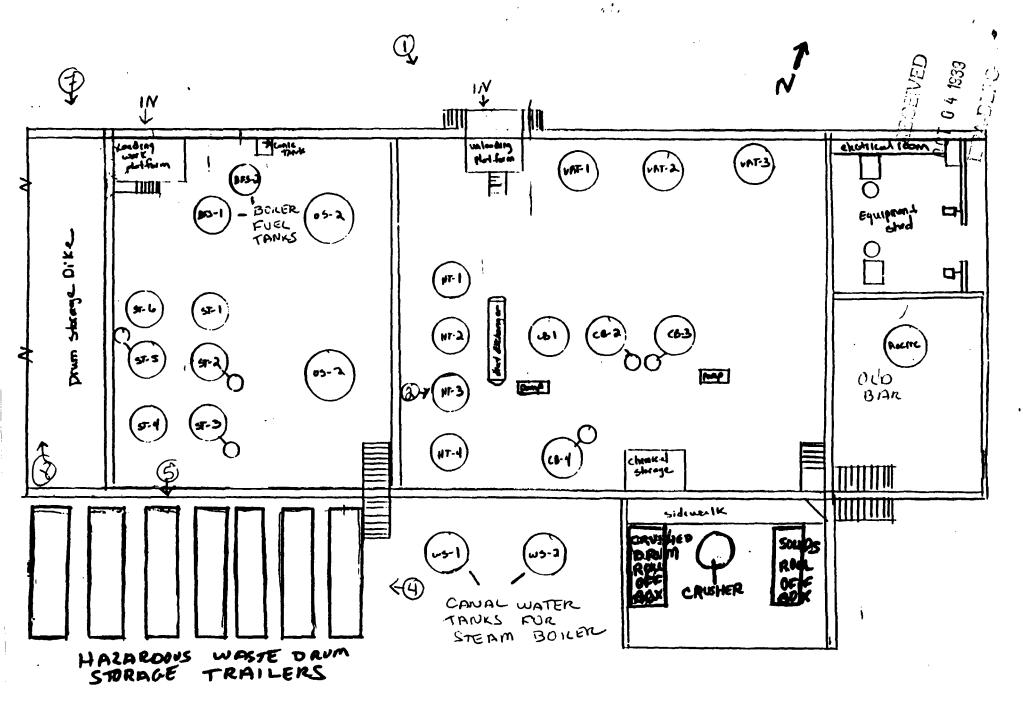
- Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- Tol Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- T04 Treatment in containers. Treatment in containers is not occurring at this time.

NOTE #2 - Aisle space was not provided for the drums in one of the trailers. According to Paul Zajec, inspections are not conducted of the inside of the storage trailers. HES considers the trailer itself a container therefore only the outside of the trailer is inspected for leaks. Wet oil dry was observed inside the trailer. According to Mr. Zajec the wet spot was probably due to rain entering the trailer through leakage.

APPARENT VIOLATIONS

- 725.115a The inside of the container storage trailers are not being inspected.
- 725.115b The container storage trailers are not included in the inspection schedule.
- 725.135 Inadequate aisle space inside a container storage trailer.
- 725.274 Containers in the trailers are not inspected weekly.
- 726.134c Marketer of hazardous waste fuel is out of compliance with 725 subparts B, C and I.

CAG: bh: 4259B



Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
OTH	1	F/U		PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes No N/A 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes No N/A 3) By March 27, 1987 for generators who generate	Ì		-	PECEIVED OCT 0 4 1539 IEPA-DLFC
				more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1			Section 703.151: Application by New HWM Facilities			X	
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes No				FACILITY
				Is the facility only operating with a RCRA permit? Yes No				
				NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.				
ОТН	1			Section 703.152: Amended Part A Application	X			
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:				
				1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes No N/A				
				2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes No N/A				
				NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
ОТН	1			Section 703.154: Prohibitions During Interim Status	X			
				During interim status, has the facility refrained from:				
			a	 Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes No 				
			b	 Employing processes not specified in Part A of the permit application? Yes No 				
			С	 Exceeding the design capacities specified in Part A of the permit application? Yes No 			:	
нто	1			Section 703.155: Changes During Interim Status	X			
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
·			đ	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes No N/A				
A.	-							

			VAL		Τ		2	REVISION 1 (0/15/00)
Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent : liance? No	Not Applicable	Remarks or Comment No.
отн	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes No	X			
ОТН	1			Did the generator follow the procedures specified in this section in making its determination? Yes No Section 722.112: USEPA Identification Number Has the generator obtained a USEPA identification number? Yes No Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facili-	X			
				ties that have received a USEPA identification number? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yes	parent liance?	Not Applicable	Remarks or Comment No.
MAN 2	2		a	PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes No Note: If the generator has not used a manifest, check No in the Apparent Compliance Column and skip to 722.130. Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes No Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility. In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes No No No No No No No No No No No No No	X		Z	NO SUCH INSTANCES IN THE LAST 6 MONTHS

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
MAN	2			Section 722.121: Acquisition of Manifests	X		-	
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes No N/A N/A				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?				
				or				
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes No N/A				
MAN	2			Section 722.122: Number of Copies	X		-	
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			Section 722.123: Use of the Manifest	X			
				For each manifest received, has the generator:				
-				<pre>1) Signed the certificate by hand? Yes No</pre>				
	-			2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
			d	3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes No 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes No NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s. Has the generator apparently given the remaining copies of the manifest to the transporter? Yes No Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes No N/A Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes No N/A N/A			NO BULK SHIPMENTS BY RAK OR WATER

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent pliance?	Not Applicable	Remarks or Comment No.
				PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements				
отн	1	X		Section 722.130: Packaging	X			
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
ОТН	1	X		Section 722.131: Labeling	X			
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
отн	1	Х		Section 722.132: Marking	X			
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes No				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with:				
				- The generator's name and address? Yes No				
-				- The manifest document number associated with the container? Yes No				
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		oparent oliance?	Not Applicable	Remarks or Comment No.
отн	1	X		Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? MOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain. Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	Yeş	No	Not X	TRANSPORTER PROVIDES PLACAROS WASTE IS NOT ACCUMULATED AS IT IS ALL IN THE PERMITTED STOLLAGE AMERICA
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7.88	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement .	parent liance? No	Not Applicable	Remarks or Comment No.
			cl	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes No			NO SATELLITE ACCUMULATION

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
ОТН	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping	~			
Oin	2			Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes No				
			b	- A copy of each annual report? Yes X No				
			b	- A copy of each exception report? Yes No N/A	} 			NONE REQUILLED
			С	 Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes No N/A 				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes No N/A				NONE REQUIRED
-			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes No N/A				

Aras	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
MAN	1	1160	a b	Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? MOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266. Section 722.142: Exception Reporting Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes No Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes No Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and	Yeş	No	NON	NO EXCEPTION REPORTS NEEDED
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yes	parent liance? No	Not Applicable	Remarks or Comment No.
				 A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes No N/A 				
ОТН	1			Section 722.143: Additional Reporting			X	10NE
				Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				REQUINED
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
OTH				PART 722 GENERATOR STANDARDS Subpart E: Exports of Hazardous Waste Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes No NOTE: If "No", skip Subpart E. If "Yes", answer the next question. Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes No NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.		X	NO EXPANTS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?		Remarks or Comment No.
MAN	1		b 1	PART 722 GENERATOR STANDARDS Subpart F: Imports of Hazardous Waste Section 722.160: Imports of Hazardous Waste Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that:		X	NO IMPORTS
				In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;			
			b2	Has the importer or his agent signed the manifest in place of the generator; and			
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes No N/A			
:				Is the person importing hazardous waste using manifests obtained from the Agency? Yes No			
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance?	Not Applicable	Remarks or Comment No.
отн	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions	X	\		
			ď	under Section 725.101(c)? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
отн	1			Section 725.111: USEPA Identification Number	X			
				Has the facility obtained a USEPA identification number?				
нто	1			Section 725.112: Required Notices	X			
	i		a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes No N/A				NO WASTE RECEIVED EROM PORGIGN SOURCE
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes No N/A				
ОТН	1			Section 725.113: General Waste Analysis	-X			
			al	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
			al	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes No			
		<u> </u> 	a 3	Has the analysis been repeated:			
				A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes No N/A			
				B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes No N/A			
			a 4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes No N/A			
			b	Has the owner or operator developed a written analysis plan? Yes X No			
-				NOTE: If "No", skip to 725.114.			
				Is the written waste analysis plan available at the facility? Yes No			

Area	Class	90 Day F/U	Key Ltr Sub	Requirem e nt		parent liance?	Applicable	Remarks or Comment No.
		Req	Sec	Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes No	Yeş	No	Not	
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? YesNo				
				2) The test methods which will be used to test for those parameters? Yes No				
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes No				·
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes No				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes No				
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Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1	X	С	6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.474 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the specific waste management methods being employed. For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes No N/A 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes No N/A Section 725.114: Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes No	X			

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
			b	Does a non-exempt facility have either: 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes No			
			b	2) An artificial or natural barrier which com- pletely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility?			
			С	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be			
				dangerous.			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent bliance? No	Not Applicable	Remarks or Comment No.
ОТН	2		a	Section 725.115: General Inspection Requirements Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes No Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes No Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes No No No No No No No No	X		Containers in trailers are not inspected Containers in trailers are not included
			ъ3	Is the written schedule at the facility? Yes No Does the schedule identify the types of problems which are to be looked for during the inspection? Yes No Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes No			The schedule does not include containers stored in clude containers

Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
			c d d	- The items and frequencies, where applicable, called for in Sections: - 725.274 (Containers) - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes No N/A NOTE: Circle the applicable section. Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes No Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes No N/A Does the owner or operator record the results of inspections in a log or summary? Yes No The date and time of the inspection? Yes No The name of the inspector? Yes No The name of the inspector?			CONTAINERS STORED IN TRANCERS ARE NOT INSPECTE

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
				 A notation of the observations made? Yes No The date and nature of any type of corrective action? 			
ОТН	2			Yes No N/A Section 725.116: Personnel Training			
				Does the facility have a training program? Yes No			
				NOTE: If "No", skip to Section 725.117, Page TSD-B-10.			
			a1	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes No			``
				Is the training program formalized, i.e., written down? Yes No			
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes No			
-			a 3	Does the program cover, at a minimum:			
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes No N/A			

<u> </u>	Class	Day F/U Req	Sub Sec	Requirement	parent diance? No	Not Applical	Remarks or Comment No.
				B) Key parameters for automatic waste feed cutoff systems? Yes No N/A			
				C) Communications or alarm systems? Yes No N/A			
				D) Response to fire or explosion? Yes No N/A			
	:			E) Response to ground water contamination inci- dents? Yes No N/A			NOT AN LOP
				Does the program cover the implementation of the con- tingency plan? Yes No			
			b	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes No N/A			
			С	Has the facility conducted an annual review of the initial training? Yes No N/A			
			đ	Are the following documents and records being maintained at the facility:			
-				The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes No			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes No				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes No				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes No				
			е	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes X No N/A				
ОТН	1	X		Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	X			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes No				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes X No				

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
			а	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes No		-	
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:			
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes No			
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes No			
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes No			
				4) Damage the structural integrity of the device or facility containing the waste? Yes No			
~				5) Through other like means threaten human health or the environment? Yes No			
-							

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent liance? No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes No N/A			X	NO SUCH LAND FORMS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Ap Comp Yeş	parent bliance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention				
ОТН	1	Х		Section 725.131: Maintenance and Operation of Facility	X			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:				
				Air;Soil; orSurface water,				
				which would threaten human health or the environment? Yes No				
ОТН	1	χ		Section 725.132: Required Equipment				
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				ALARM SISTEM
			a	 An internal communications or alarm system capable of providing immediate emergency instructions? Yes No N/A 				HCARM SIS
			b	A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes No N/A				TELEPHONE

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent pliance? No	Not Applicable	Remarks or Comment No.
ОТН	1	x		Section 725.134: Access to Communications or Alarm Systems	X			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes No N/A				
			b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes No N/A				
отн	1	Х		Section 725.135: Required Aisle Space		X		
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
ОТН	2			Section 725.137: Arrangements with Local Authorities	X			
-			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes No N/A			
				Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes No N/A			
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes No N/A			
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes No N/A			
				NOTE: Any "N/A" answer must be explained in the Comments.			
-			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes No N/A			REKUSAUS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent bliance? No	Not Applicable	Remarks or Comment No.
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
ОТН	1			Section 725.151: Purpose and Implementation of Con- tingency Plan	4			
			a	Is a plan available? Yes No No NoTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes No				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes No N/A	ı			
HTO	2			Section 725.152: Content of Contingency Plan	X			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
_				1) Fires? Yes X No 2) Explosions? Yes X No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
			d d	3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes No			Lemont Police & pire Silver Cross Hosp. Palos Community NOSP.

Area	Cless	90 Day	Key Ltr	Requirement		parent bliance?	pplicable	Remarks or Comment No.
*		F/U Req	Sub Sec	Trequisition:	Yeş	No	Not Ap	nemarks of Comment No.
				2) A brief outline of the capability of each piece of emergency equipment? Yes No				
				3) The location of each piece of emergency equipment? Yes No		ļ		
			е	Is the list of emergency equipment up-to-date? Yes No				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes No N/A				
			f	Does the plan identify the signal to be used to begin evacuation? Yes No				Verbal signal
			f	Are alternate evacuation routes identified? Yes No				continuous blast
ОТН	2			Section 725.153: Copies of Contingency Plan	X			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes No				
-			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes No				
<u> </u>		l						

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
отн	2			725.154: Amendment of Contingency Plan Has the contingency plan been reviewed and, if necessary, amended whenever:	X			
			a b	 Applicable regulations are revised? Yes				HAS NOT FAILED
			С	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes No N/A				NO MAJOR PESIUN CHANGES
			d	4) The list of emergency coordinators changes? Yes No				CHANGES
ОТН	2		e	5) The list of emergency equipment changes? Yes No Section 725.155: Emergency Coordinator Is there an emergency coordinator on-site or on-call at all times? Yes No	X			

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Carol A. Graszer

City: Lemont

:EPA #: 0311620007

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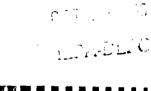
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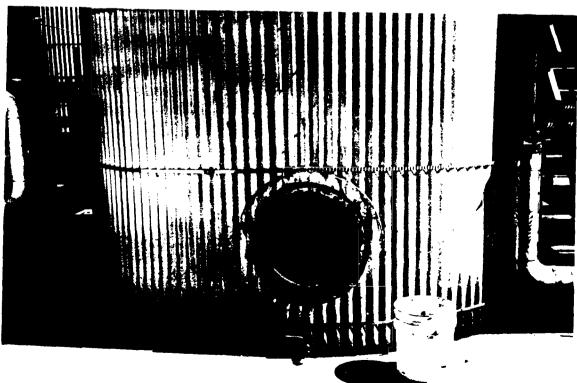
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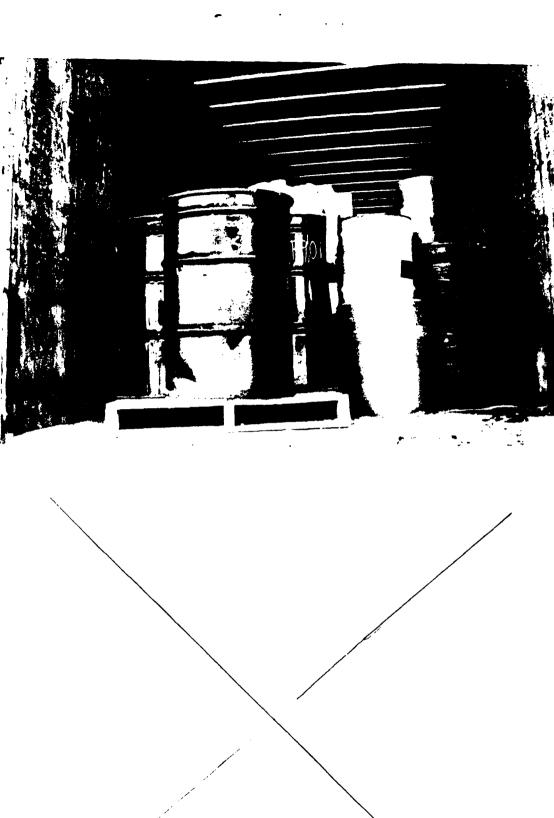




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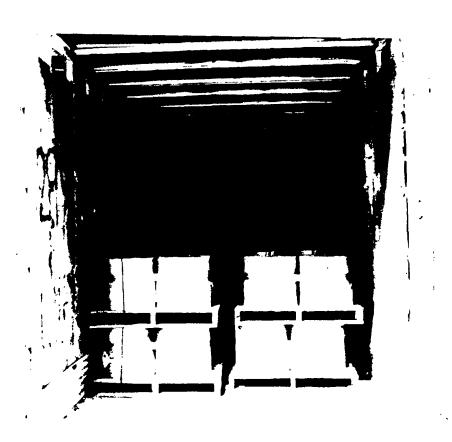
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Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes No— Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes No— Section 725.156: Emergency Procedures Has the facility had a release, fire or explosion? Yes No— NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.			9-1-88 SHINEDDER WIT FIRE. SEE INSPECTION REPORT FROM 3-89 FOR DETAILS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
MAN	•			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting	×			
MAN	1			Section 725.171: Use of Manifest System				
				Does the facility accept waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes No				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes No N/A				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes No				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes No				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
НТО	2			Section 725.173: Operating Record	X			
			a	Does the owner or operator have a written operating record at the facility? Yes No				
			b	Is the information in the operating record being main- tained until closure of the facility? Yes No				
			b	Does the operating record contain the following information:				
				1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes No				
				2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes No				
				3) The location of each hazardous waste within the facility? Yes No				
_				4) The quantity of each hazardous waste at each location within the facility? Yes No				
,				5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes No N/A				NOT AN LOF.

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent pliance?	Not Applicable	Remarks or Comment No.
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes No N/A 7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes No N/A - 725.293 (Tanks)? Yes No N/A - 725.325 (Surface Improvements)? Yes No N/A - 725.352 (Waste Piles)? Yes No N/A - 725.373 (Land Treatment)? Yes No N/A - 725.441 (Incinerators)? Yes No N/A - 725.475 (Thermal Treatment)? Yes No N/A - 725.502 (Chem., Phys., Bio. Treatment)? Yes No N/A 8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes No N/A	Yeş	No	Not A	MONE OF THESE UNITS

9) Records and results of inspections as required by Section 725.115(d)? Yes No	Area	Cless	90 Day F/U Req	Key Ltr Sub Sec	Requirement	oparent oliance?	Remarks or Comment No.
- 725.376 (Land Treatment)? Yes No N/A					by Section 725.115(d)? Yes No No NoTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action. Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes No N/A - 725.376 (Land Treatment)? Yes No N/A - 725.376 (Land Treatment)? Yes No N/A - 725.378 (Land Treatment)? Yes No N/A - 725.447 (Incinerators)? Yes No N/A - 725.447 (Incinerators)? Yes No N/A - 725.477 (Thermal Treatment)? Yes No N/A MOTE: Data required under 725.194 must		NOT AN L.D.F.

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
нто	2			11) All closure cost estimates required by Section 725.242? Yes No N/A 12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes No N/A Section 725.174: Availability, Retention and Disposition of Records	×			NOT AN LO.R.
				During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes No N/A Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency?				NOT AN.
			b	Yes No The local land authority? Yes No N/A Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes No N/A				NOT REQUIRED

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	2			Section 725.175: Annual Report	X			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
ОТН	1			Section 725.176: Unmanifested Waste Report	X			
				Does the facility accept hazardous waste from off-site? Yes No				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes No				WACTE OF
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes No Np 🔀				MASTE NOT ACCEPTED WITHOUT MANIFEST
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
,				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes No				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	pparent bliance? No	Not Applicable	Remarks or Comment No.
отн	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes No Section 725.177: Additional Reports Has the owner or operator submitted to the Agency, as	X			
			a b	required, reports concerning: 1) Releases, fires, explosions as specified in Section 725.156? Yes No N/A 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes No N/A 3) Facility closure as specified in Section				NOT AN L.D.F.
				725.215? Yes No N/A				

Are.	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement .	parent liance?		Remarks or Comment No.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes No N/A			
				- No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes No N/A			
CLO	1			Section 725.218: Post-Closure Plan		Z	NOT AND L.D.F.
			a	Was the most current facility post-closure plan available during the inspection? Yes No			L. D. 1
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes No N/A			
FIN	1			Section 725.242: Cost Estimate for Closure			
				Has the facility prepared a written estimate of the cost of closing the facility?			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care			
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?			
				MOTE: If no post-closure plan, mark "N/A".			

Ares	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
ОТН	1	Х		Section 725.276: Special Requirements for Ignitable or Reactive Wastes	X			
				Are containers holding ignitable or reactive waste located at least 50 feet from the property line?				
отн	1	х		Section 725.277: Special Requirements for Incompatible Wastes	X			
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?				
-								

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance?	Not Applicable	Remarks or Comment No.
ОТН	2		a	PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes No If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes No NOTE: Failing the filter test means that the waste contains free liquids. Section 725.291: Assessment of Existing Tank Systems For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes No NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.			TANKS ARE PROTECTED BY SE CONDARM CONTRITORIT ANTHOUGHT ASSESSMENT IS PRIMITELE (MAY 20+21, 1987)

b Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection,	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	<	Remarks or Comment No.
Yes No	OTH	1	Req	b	1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes No Section 725.292: Design and Installation of New Tank Systems or Components For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes No Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave. 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and	Yeş	No	Not	TANKS AT LEAST by YEARS OUD

Area	Closs	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent pliance? No	Not Applicable	Remarks or Comment No.
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes No				
отн				Section 725.293: Containment and Detection of Releases	ļ			
			aI	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes No N/A				NO NEW TANKS
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes No N/A				THESE WASTES ARE NOT STORED
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes No N/A				SECONDARY CONTAINMENT PROVIDED FOR ALL WASTE
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes X No N/A				ALL WASTE
				or If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes No N/A				
			a 5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes No N/A				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
			b1&2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes No N/A			
				NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).			
			с4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes No N/A			
				NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.			
			d	Does the secondary containment have one or more of the following:			
				1) a liner (external to the tank); or			
				2) a vault; or			
				3) a double-walled tank; or			
				4) an equivalent device (approved by the Board)? Yes No N/A			
-				NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.			
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:			

1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A	Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
				Sec	joints, valves and connections) that are inspected daily; 2) welded flanges, joints and connections that are inspected daily; 3) sealless or magnetic coupling pumps that are inspected daily; and 4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes No N/A Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes No N/A 2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes No N/A 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)?	Yeş	No	Not	All tanks are above y. ound

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance? No	Not Applicable	Remarks or Comment No.
ОТН	1	X	b3	Section 725.294: General Operating Requirements Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes No Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes No N/A If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes No N/A	X			NO UNCOVERED
ОТН	2		С	Section 725.295: Inspections Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes \(\sum \) No \(\sum \)	X			
ОТН - -	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes No NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			X	NO APPAMENT LÉAKS OR SPILLS

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Remarks or Comment No.
				If a tank or secondary containment system has leaked, has the owner done the following:		(
			a	<pre>1) Ceased using, stopped inflow of wastes? Yes No</pre>		
			ь	Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes No		
				3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes No		
			d	4) Reported to the Agency within 24 hours of detection? Yes No		
		,		NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.		
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes No		
			e4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes No N/A		
				NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.		V

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	Comp	parent liance?	Not Applicable	Remarks or Comment No.
CLO	1		f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes No N/A Has the certification been submitted within 7 days after returning the tank system to use? Yes No N/A Section 725.297: Closure and Post Closure Care			×	
020	-			NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				NO CLOSURE
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes No				
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes No				
-			b	If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes No				
				NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement		parent liance?	Not Applicable	Remarks or Comment No.
ОТН	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes	X			
				Are ignitable or reactive wastes stored in tanks? Yes No NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes No				
			_	NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.				
			b	Are there proper protective distances between the waste management area and the facility boundary line? Yes No				
ОТН	1			Section 725.299: Special Requirements for Incompatible Wastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes No N/A				INCOMPATIBLES NOT TREATED UR STORED IN THE SAME TANK SYSTEM
							:	

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	,	parent liance? No	Not Applicable	Remarks or Comment No
				PART 726 STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES Subpart D: Hazardous Waste Burned for Energy Recovery				·
			•	NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart 0 incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.				
НТО		x		Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel	X			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes No N/A				
НТО				Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel			X	FAULITY IS NOT THE TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes No N/A			\ \ {	,
ОТН		X		Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel		X	-	SYSTEC - INDIANA
OTH -	II		а	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes No N/A				SYSTEC - INDIANA CONTINENTAL CEMENT - MI
				and				

Area	Class	90 Day F U Req	Key Ltr Sub Sec	Requirement	parent liance? No	Not Applicable	Remarks or Comment No.
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes No N/A			
	11		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes No N/A			
	I		С	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes No N/A			
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes No N/A			It is burned in a
	II		е	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes No N/A			Cement 1611 n In apparent compliance with 726.131(c).
-	11		е	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes No N/A			
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes No N/A			

Name of Facility: Potrochem Services Inc. (Her tright Entropy Entropy Services Inc. (Her tright Entropy His Services Inc.) 10. Number: 160085349264 (03/16/20007)
Name of Facility: 100 October 200 1/100 1/
1D. Number: 1500033(9269 (03))
Location: (Suphen Street (Canal Bank Rd. N. E.)
Lamort IL 60639
Date of Inspection: 4-15-29
Inspector: Carol Graszur
Telephone Number: (312) 345-9720
Interim Status RCRA Permit Treatment Storage Disposal Land Disposal Facility
Are there any known releases? Yes No
Does the unit receiving CERCLA waste meet the double liner requirements? Yes X No
Any Class I violations? Yes No
If yes, identify type briefly:
INVERCENT AISLE SPACE IN CONTAINER
STORAGE TRAVER - 725.135
Schedule for next inspection: MARCH 1990

327 18 1000

FOLD ON LINE

United States Environmental Protection Agency 230 South Dearborn Chicago, Illinois 60604

Official Business
Penalty for Private Use \$300



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United States
Environmental Protection Agency
Waste Management Division
230 South Dearborn Street
Chicago, Illinois 60604

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Carol A. Graszer Attn:

Environmental Protection Specialist

Field Operations Section

Division of Land Pollution Control

1701 South First Avenue

Suite 600

Maywood, IL 60153

List of tank volumes at Heritage Environmental Services, Lemont,

TANK VOLUMES

46,016 Gal. SUPPLEMENTAL FUEL

DIL & WATER 14,454 Gal.

TREATMENT WATER 16,389 Gal.

14,355 Gal. LOW FLASH LIQUID

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439 Telephone 312/739-1150

HERITAGE REMEDIATION/ENGINEERING, INC.

P.O. Box 337 Lemont, IL 60439

Phone 312/739-1150 Fax 312/739-9491

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Attn: Carol A. Graszer

Environmental Protection Specialist

Field Operations Section

Division of Land Pollution Control

1701 South First Avenue

Suite 600

Maywood, IL 60153

List of generators and hazardous waste stored in trailers at Heritage Environmental Services, Lemont, IL.

GENERATOR	HASTE	HAZ. CODE
DEA	ISOPROPYL ALCOHOL	DOO1
DEA	HAZARDOUS WASTE LIQUID	2000
DEA	BENZALDEYNE	D001
DEA	ACETONE	D001
DEA	RED PHOSPHORUS	DOO1
DEA	FREON-CARBON TETRACHLORIDE	U211
D€A	METHAMPHETAMINE & ACETONE SOAKED	
	OIL DRY	D001
DEA	SODIUM HYDROXIDE	DO05
DEA	PHENYL ACETIC ACID	2000
DEA	PYRIDINE	U179
DEA	ALKALINE LIQ.(LYE & WATER)	DO 05
DEA	MURATIC ACID	D005
DEA	HYDROCHLORIC ACID	0002
DEA	TRICHLOROFLOUROMETHANE	F002
DEA	ACETIC ANHYDRIDE	D002
MISSOUR1 DNR	WASTE FLAMMABLE LIQUIDS	DOO1
MISSOURI DNR	HAZ. WASTE LIQUIDS	0005
MISSOURI DNR	ACIDS	D002
HERITAGE	TOLUENE(LAB USE)	D001
HERITAGE	FLAMMABLE SOLIDS F001,F	C003,E005
HERITAGE	FLAMMABLE LIQUIDS	D001
HERITAGE	CHLOROFORM	U044

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439 Telephone 312/739-1150



Carol A. Graszer

Environmental Protection Specialist

Field Operations Section

Division of Land Pollution Control

1701 South First Avenue

Suite 600

Maywood, IL 60153

List of drum inventory at Heritage Environmental Services, Lemont, 1L

DRUM INVENTORY

ACID 2 DRUMS FLAMMABLE SOLIDS 209 DRUMS FLAMMABLE LIQUIDS 34 DRUMS WON-HAZARDOUS DILS 10 DRUMS

If you have any questions, please call Paul A. Zajec at 739-1150.

HERITAGE ENVIRONMENTAL SERVICES, INC.

P.O. Box 337 • Lemont, Illinois 60439 Telephone 312/739-1150

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Per	brochem Service	s Inc. (Her	Hage Environmen	(al Services)
U.S. EPA I.D.	No.:		(031/620	1607)
Street:	Stephen St	eet Can	JBank RD. n	broke ast)
	.O. BON 337	ite: <u>I</u>		de: <u>6063</u> 9
Telephone:	(3/2) 739	-1150		·
Operator: $\overline{\mathcal{P}}$	excochem Serv	ces he (H	er) tage Environ	mestal Serias)
Street:	Stephen Street	+ (Canal-	Bank Rd. Nov	theast)
City:	amont Sta	ite: <u>I</u> L	Zip Co	de: <u>60639</u>
Telephone:	(312)739	-1150		
Owner: 🔟	Later Reclas	nation Di	strict of Gr	exer Chica o
Street:		Erie S		
City:	Phicyo Sta	ite:	Zip Co	de: <u>606//</u>
Telephone:	(3/2) 675	5-7090		
Inspection Da	te: 9:	45a - 1:30 SW	eather Conditions: 63	CLEPR
	Name	Affiliation	Telepho	
Inspectors:	Carol Gras	er IE	PA (312) 345	-9770
	RON BROW	N USE	PA (312) 86 PA (312) 35	36-4463
Facility Repre	esentatives:	aul Zar	ec (312) 7	39-1150
	RCRA Status		LDR Status	
		F-Solvent	California List	First Third
Generator		_X_	X	X
Transporter				
Treater	X	_X_		X
Storer	X		X	
Disposer				
		REC	EIVED	
		1	o 4 1989	Revised 9-26-88
		COL	-	

IFPA-DLPC

IL 532-1739 LPC 296 11/68

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

NO PCBS

•			lity group of t			ermine the
			X Yes		_ No	NA
	If yes, che	ck the ap	propriate treat	ability	group.	
	by w Phari spent	eight) naceutica methylen	l wastewater c ie chloride	ontaini		equal to 1% TOC
	X All o	her spent	solvent waste	S		
2.			tes: Does the g	•		y determine
	conce 500 p existi burni	ntrations pm, is the ng TSCA ng in high	ardous waste to greater than of treatment in thermal treatment h efficiency be 0 CFR 761.70)	r equal accordanent regoilers (4)?	to 50 but nee with sulations of CFR 76	for 51.60) or
			Yes		_ No	X_{NA}
	If. ye:	, specify	the method: _			
	conce the w	ntrations aste incin	ardous waste the greater than of the greater than of the greated or disposate methods (r equal osed of	to 500 pr	om, is
			Yes		_ No	_X NA
	subm Admi	tted a wr nistrator	the method an itten request to or Assistant Amnual the incinerat	o the R dminist	egional rator for	

	3.			Does the gene lity group of t	rator correctly the waste?	determine the
				Yes Yes	No	NA
		If yes, che	eck the ap	propriate treat	ability group.	-de
		<u>_x</u>	Wastewat filterable Nonwaste	solids)	% TOC by weig	ght and less than 1%
		List the w	aste code	and check the	correct treatme	ent standard group.
		Waste Cod	le	Wastew	ater	Nonwastewater
		<u> 129, U</u>	036,		 -	<u>~</u>
		V051, U	188	. 		<u></u>
		V122, P	037	·		
						<u></u>
		0036 V PO13, U P123, F	129		-	
B.	Was	P123', F te Analysis	001'			<u> </u>
	1.	F-Solvent	Wastes			
				ator determine ent standards?	whether the F	F-solvent waste
				_X Yes	No	NA
		How	was this o	determination	made?	
		-	Knowledg	ge of waste &	nd analysi	S
		,		X Yes	No	
					g data available	e for review? Describe
		•	TCLP	Yes		
					of last test, the Attach test re	e frequency of testing, sults.

D	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?
	No NA
	If yes, specify the waste stream: FOOI, FOOD, FOOD, FOOD
c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
	Yes No NA
d.	How does the generator test F-solvent waste when a process or waste stream changes?
	Shipment use- site.
2. Ca	lifornia List Wastes
a .	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
	No NA
b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
	Yes No NA
	What type of absorbent is used? None Alan. Check the types of waste to which absorbent is added. Liquid hazardous waste having a pH less than or equal to 2
	Liquid hazardous waste containing metals
	Liquid hazardous waste containing free cyanides
c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
	- Knowledge of wastes
	Yes No NA

	how this is adequate.
	- Testing
	If yes, list test method used: fingusparted for pH
d.	Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?
	Yes No NA
	- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: ———————————————————————————————————
e.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
	Yes No NA
Fir	st Third Wastes:
a.	Does the generator correctly determine the appropriate treatment standard of the waste?
	Note: The treatment standards for first third wastes are given in Appendix D.
b.	Does the generator determine whether the First Third waste exceed treatment standards upon generation?
	Yes No Soft hammer
	If yes, specify the waste stream: 106/
	How was this determination made?
	- Knowledge of waste
	X Yes No
	If yes, is any supporting data available for review? Describe how this is adequate

			- TCLP
			Yes No NA
			- Total Constituent Analysis
			Yes No NA
			Provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		c.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
			Yes No NA
		d.	How does the generator test the waste when a process or waste stream changes? Off SHE / Who
c.	Mar	agem	ent
	1.	On-	Site Management
			estrict waste or waste that exceeds the treatment standards ted, stored, or disposed on-site?
			Yes No
		If y	es, the TSD Checklist must be completed.
	2.	Off	-Site Management
	•	a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
			X Yes No
		b.	Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
			Yes No

c.	Does notification contain the following?	•		
	EPA Hazardous waste number(s)	X Yes	No	
	Applicable treatment standards	X Yes	No	
	Manifest number	X Yes	No	
	Waste analysis data, if available	X Yes	No	
	Identify off-site treatment or storage factions, 14 FS WDIANA, 5 YSTEC	cilities: <u>CWM</u>	ROLLINS,	
d.	Does the generator ship any waste that r treatment standards to an off-site dispos			
	Yes	0		
c.	Does the generator provide notification certification to the disposal facility [268]		N	4
	Yes No	0		
f.	Does notification contain the following?	,		1
	EPA Hazardous waste number(s)	Yes	No	
	Applicable treatment standards	Yes	No	
	Manifest number	Yes	No	
	Waste analysis data, if available	Yes	No	
	Certification that the waste meets treatment standards	Yes	No	
	Identify off-site land disposal facilities:			_
			/	
g.	Is the waste subject to a nationwide vari by case extension (268.5), or petition (268			
	Yes	0 NA		<i>A</i>
h.	If yes, does the generator provide notific receiving facility that the waste is not p. [268.7(a)(3)]?	cation to the off- rohibited from la	site and disposal	
	V.	_		_

					Λ
	i.	If yes, does the notification contain the	following infor	mation?	1
		EPA Hazardous waste number	Yes	No	
		The corresponding treatment standards and all applicable prohibitions	Yes	No	
		Manifest number	Yes	No	
		Waste analysis data, if available	Yes	No	
		Date the waste is subject to the prohibitions	Yes	No	
	j.	Does the generator retain copies of all no a period of 5 years?	otices and certi	fications for	
			Yes	No	
	a.	Has the generator attempted to locate an and recovery facilities that provide treat greatest environmental benefit [268.8(a)(1)]	ment that yield		
		greatest environmental benefit [200.0(a)()	Yes	No	
	b.	Has the generator submitted to the Region demonstration and certification containing to document its efforts to locate practical	ng the followin	g information	
		A list of facilities and facility officials contacted?	Yes	No	
		Addresses	X Yes	No	
		Telephone Numbers	_X Yes	No	
		Contact dates	_X Yes	No	
		Attach a copy of the demonstration	and certificati	ion	
•	c.	If the generator has determined that therefore treatment for its wastes, has it sent documents demonstrating why it was not able to obtain the waste? Yes No	mentation to El	PA	NA
		If yes, attach a copy of written discussio	n.		

d.	Does th	he generator ship his	waste off-site	for treatment	:?
		X Yes	No		
	Descrit INC IHES	be the type of treatm INERATORS: F INDIGNA-TR	nent and treats OSS, ROLL FOR MENT	nent facilities NS CWM LEMEN CONT.	T KILNS:
c.	Did the	e generator send a coreceiving facility wi	opy of its dem th the first sh	onstration and	certification
		Yes	No	•	
f.		he generator provide int of wastes?	certification	with each subs	equent
		X Yes	No	•	
g.		he generator provide ng facility with eacl			o the
	(i)	EPA Hazardous	waste number	_X Yes	No
	(ii)	Manifest number	r	_X Yes	No
	(iii)	Waste analysis d if available	ata,	X Yes	No
h.		he generator retain c cations for a period		otices, demonst	rations, and
		Y Yes	No	•	
(i.e., boile	ers, furn	RCRA 264/265 Exenaces, distillation uni- elementary neutrali	ts, wastewater	rocesses	
		nt residuals generate A 264/265? Yes		or processes ex	empt
If y	es, list t	ypes of waste treatm	ent units and	processes:	
·					

E.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

•	<u>Ger</u>	<u>ierai</u>	Facility Standards
	1.		es the waste analysis plan cover Part 268 uirements [264.13 or 265.13]?
		o l	F-solvent Yes No NA
		0 (California List Yes No NA
		o l	First Third Yes No NA
	2.	Doc was	es the facility obtain representative chemical and physical analyses of stees and residues?
			X Yes No
		a.	What date was the waste analysis plan last revised? 11-8-88
		b.	Are analyses conducted on-site or off-site?
			On-site \(\times \) Off-site
			Identify off-site lab: Pronded by generator
		c.	Is F-solvent waste analyzed using TCLP?
			Yes No NA
		d.	Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?
			YesNo NA
•			Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.
		c.	Describe the frequency of sampling: Analysis provided

	3.	Are the operating-records, including analyses and quantities, complete [264.73/265.73]?	
		Yes No	
B.	Sto	rage (268.50)	
	1.	Are restricted wastes stored on-site?	
	••		
		If no, go to C, Treatment.	
	2.	If yes, check the appropriate method.	
		Tanks Containers	
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?	
			_
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?	
		Yes No	
	5.	Do operating records agree with container labeling?	
		Yes No NA	
	6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years? Yes No	
		Apparent violation cited 3/89 corrected by recent accompanionant of north cation with	k

	regulations went into effect?
	Yes No NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No
	If yes, state how:
8.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?
	Yes No
9.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating
	record? X Yes No NA
Tre	atment
1.	Does the facility treat restricted wastes other than in surface impoundments?
	Yes No
	If no. go to D. Treatment in Surface Impoundments

C.

	Describe the treatment processes:
3.	Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?
	Yes No
4.	Is dilution used as a substitute for treatment?
	Yes No
6.	Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?
	Yes No
7.	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
~ (Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility?
1	Yes No
	If yes, does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
1	Identify off-site disposal facilities:

		8.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
			Yes No NA
			If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
			Yes No
	D.	Tre	atment in Surface Impoundments
		1.	Are restricted wastes placed in surface impoundments for treatment?
JA			Yes No
1			If no, go to E, Land Disposal.
		2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
			Yes No
		3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
			Yes No NA
		4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
			Yes No
يدود نيونند ديو ۽ ڊ			Attach test results.
	/ .	5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?
V			Yes No

E. Land Disposai

IND SPOSE	Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?
A POST	Yes No
(0)2,	Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.
	If yes, specify which units and what wastes each unit has received:
2.	Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?
	Yes No
3.	Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?
	Yes No
4.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?
	Yes No
	If yes, at what frequency?
5.	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?
	Yes No
6.	Does the facility dispose of restricted wastes that are subject to a national capacity variance?
	Yes No

7.	Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?
	Yes No NA
8.	What is the volume of the restricted wastes disposed of to date?
9.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?
	Yes No NA

NARRATIVE

Heritage Environmental Services, Inc. (HES) generates, treats and stores hazardous waste. HES consists of two divisions. The first, Remediation Engineering, is involved with oil and chemical industry clean-up and emergency spill response. HES temporarily stores waste for DEA and formerly stored waste for IEPA ERU/DCI activities. Temporary storage of household hazardous waste collected in a program in Indianapolis, Indiana, has been discontinued.

The second division is waste oil reclamation/secondary fuel blending. When waste is brought on-site it is "fingerprinted" for flash point and pH. Both hazardous and non-hazardous wastes are accepted and processed separately. Upon acceptance PCB screening is performed while the waste is kept in any one of the storage tanks. Gravity separation occurs in Cone Bottom tanks. Solids collected in the bottom of the tanks are removed, and separated water is stored until it can be shipped to HES in Indiana. Non-separated oil water mixtures are then treated with heat in order to facilitate separation. The oil resulting from this process is hazardous waste fuel which is sold to cement kilns. Non-hazardous oil is sold as fuel for rotary kilns used in asphalt production

HAZARDOUS WASTES GENERATED

- Note #1 Wastes going off-site for further treatment, incineration or reclamation are analyzed on the day of transport.
- Hazardous Waste Fuel D001, F003, F005. Waste oils, paints, solvents and clean-up materials from spills are blended and sold as a secondary fuel to be burned in cement kilns. At the time of the inspection the fuel was being sold exclusively to Systec in Indiana. The last shipment was 9/15/89. The last shipment to Continental Cement in Missouri was 6/21/89. Approximately 500,000 gallons are generated yearly. There were 46,016 gallons on site.
- Low Flash Water D001. Waste water separated from hazardous waste. This waste was formerly sent to Century Resources for de-watering and is now sent to HES in Indiana. The last shipment was 9/7/89. Approximately 15,000-20,000 gallons are generated annually. There were 14,355 gallons on site.
- Used Oil and Oil/Water Mixtures D008. Waste brought on-site from off-site that the facility was unable to treat. The last manifested shipment was on 9/7/89 and went to HES in Indiana. There were 14,454 gallons on site.
- Waste Flammable Solids F003, D008. Spill pads from emergency cleanups and solids from supplemental fuel production. The rate of generation varies. The last manifested shipment was 8/7/89 and went to CWM in Chicago for incineration. There were 209 drums on site.

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- Flammable Solids F002, F003, F005. Generated during strainer cleaning in the secondary fuel blending process. 25-50 drums are generated yearly. The waste was formerly sent to ROSS Incinerator in Ohio with the last shipment being 6/5/89. Presently HES is using Rollins Environmental incinerator in Louisiana. The last manifested shipment was 7/23/89. The amount on site is included with the above waste stream.
- Waste Petroleum Naphtha D001. Generated in a parts cleaner in the maintenance garage, 30 gallons are generated monthly. The last manifested shipment was 8/30/89 and went to Safety Kleen for reclamation.

NON-HAZARDOUS WASTE GENERATED

- Crushed Drums RCRA empty 55 gallon drums. Six loads are generated yearly. The last manifested shipment was 7/20/89 and was sent to CID #2 for landfilling. There was less than one load on site.
- Solids Non-hazardous tank bottoms and soil from remediation activities. The rate of generation varies. The last manifested shipment was landfilled at CID #2 on 8/18/89. There weren't any solids on site.
- Waste Oil Non-hazardous loads that were not gravity separated.

 Approximately 75,000 gallons are generated per year. The last manifested shipment was 8/14/89 and went to HES in Indianapolis for treatment. There were ten drums on site.
- Treatment Water Rain water and water separated from non-hazardous oil streams. Approximately 100,000 gallons are generated yearly. The last manifested shipment was 9/7/89 and went to HES in Indiana for treatment. There 16,389 gallons on site.

HAZARDOUS WASTE UNITS

Storage in Containers. The drums are stored two high on wooden pallets. The unit is located on concrete and is surrounded by a 2' high concrete dike. Acids are stored at one end of the unit while basics are stored at the other. Both the acids and basics are in their own diked areas. Containers are also stored in eight semi-trailers. The trailers are located on a curbed concrete pad. The trailers are used primarily for temporary storage of DEA wastes. DEA acts as the generator when the waste is sent off-site for incineration.

- Storage in tanks. Hazardous waste storage occurs in an area located on a concrete pad and surrounded by a six foot concrete dike. Storage tanks include the initial receiving tanks (VRT 1 through VRT 3), cone bottom gravity separation tanks (CB 1 through CB 4), and waste/product storage tanks (ST 1 through ST 6). The facility plans to close the ST 1 through ST 6 tanks.
- Tol Treatment in tanks. Heat treatment occurs in tanks HT 1 through HT 4. Waste material is heated using either internal steam coils or by circulation using an external heat exchanger. The heat facilitates oil/water separation. At this time chemical treatment is not taking place.
- T04 Treatment in containers. Treatment in containers is not occurring at this time.

NOTE #2 - Aisle space was not provided for the drums in one of the trailers. According to Paul Zajec, inspections are not conducted of the inside of the storage trailers. HES considers the trailer itself a container therefore only the outside of the trailer is inspected for leaks. Wet oil dry was observed inside the trailer. According to Mr. Zajec the wet spot was probably due to rain entering the trailer through leakage.

APPARENT VIOLATIONS

- 725.115a The inside of the container storage trailers are not being inspected.
- 725.115b The container storage trailers are not included in the inspection schedule.
- 725.135 Inadequate aisle space inside a container storage trailer.
- 725.274 Containers in the trailers are not inspected weekly.
- 726.134c Marketer of hazardous waste fuel is out of compliance with 725 subparts B, C and I.

CAG: bh: 4259B

This were no apparent LAND BAN VIOLATIONS

Facility:	PETROCHER	n DERVICE	ES INCERP	ORATED	
U.S. EPA		1.00	1	03/1620007	
Street:	NE CA	DAL BANK	Road		
City:	LEMONT	State:	TLLIBOIS	Zip Code: 60439	
Telephone					
Operator:	PETROCHE	m SERVIC	ES INCOR	PORATED	
Street:	NE CA	WAL BANK	ROAD		
City:	LEMONT	State:	TULINOIS	Zip Code: 100439	
Telephone	: 3131	1739-1150			
Owner:	METROPOLI	TENA SAPE	ARY DISTRI	CT OF GREATER CHIC	A60
Street:	100 EAS	T ERIE	STREET		
City:	CHICAGO	State:	ILLINOIS	Zip Code: Loolell	
Telephone	. 3,5	100100			
Totophone		1121-2000			
		•		itions: Cicuby, 70° F	
		•	<u>೧೯</u> ೧-Weather Cond		
	Name	/ ine:약:松島.森里: Affilia	oen₩eather Cond	itions: <u>Cecupy, 70°</u> F	
Inspection	Name	/ ine:약:松島.森里: Affilia	oen₩eather Cond	itions: Croudy, 70° F	
Inspection Inspectors	Name Tood	Affilia	DEMWeather Cond	itions: Croudy, 70° F	
Inspection Inspectors	Name TCDD Representatives:	MICHAE	DEMERTON Ation EPA CRAFTON	itions: CLOUDY, 70° F Telephone 312/345-9780 312/39-1150	
Inspection Inspectors	Name TCDD Representatives:	Affilia	DEMERTON Ation EPA CRAFTON	itions: <u>Clouby, 70° F</u> <u>Telephone</u> 312/345-9780	
Inspection Inspectors	Name TCDD Representatives:	MICHAE	DEMWeather Condation EPA CRAFTON LI	itions: CLOUDY, 70° F Telephone 313/345-9780 313/39-1150 OR Status	
Inspection Inspectors	Name Name Todo f	MICHAE	DEMWeather Condation EPA CRAFTON LI	itions: CLOUDY, 70° F Telephone 313/345-9780 313/39-1150 OR Status	
Inspection Inspectors	Name Name Cod Cod Cod Cod Cod Cod Cod Cod Cod Cod	MICHAE	DEMWeather Condation EPA CRAFTON LI	itions: CLOUDY, 70° F Telephone 313/345-9780 313/39-1150 OR Status	
Inspection Inspectors	Name Name Cod Cod Cod Cod Cod Cod Cod Cod Cod Cod	MICHAE	DEMWeather Condation EPA CRAFTON LI	itions: CLOUDY, 70° F Telephone 313/345-9780 313/39-1150 OR Status	
Inspection Inspectors	Name Name TCOD Representatives: Generator Transporter Treater	MICHAE	DEMWeather Condation EPA CRAFTON LI	itions: CLOUDY, 70° F Telephone 313/345-9780 313/39-1150 OR Status	

SUMMARY

0311620007

Petrochem Services, Inc. is a service contracting company specializing in oil and chemical industry cleaning, maintenance and emergency spill response. This facility receives hazardous and non-hazardous wastes from off site and blends and treats these wastes to produce hazardous waste fuel, off-specification used oil and on-specification used oil. (Little to no on-spec used oil is generated.) Sources of waste generated off site include cleaning tanker trucks and cleaning off site stationary tanks. This facility also operates an on site barge cleaning operation. They receive hazardous and non-hazardous wastes from IEPA (ERU)/DCI activities (spills, abandoned drums, etc.), Tox-Away (a government-sponsored Indianapolis, IN. project to handle the shipment and disposal of hazardous household wastes) and generators, for temporary storage, which are eventually going off site for incineration.

HAZARDOUS WASTES GENERATED (RESTRICTED)

Hazardous Waste Fuel - D001, F003, F005

- Generated by blending and treating hazardous and non-hazardous waste
- Rate of generation: 45,000 gallons per month
- Shipped off site approximately 3 times per week to Continental Cement (Hanibal, MO.) or Systech (Greencastle, IN.) for use as fuel in cement kilns
- Stored in tanks

APPARENT DEFICIENCY NOTED:

Containers of restricted hazardous waste are not marked to identify the date they entered storage.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

			_						
			Ge	en.	Treat	Store	Disp.	Trans.	
A.	F-S	olvent Wastes							
	1.	F001							
	2.	F002							
	3.	F003		_					
	4.	F004	_		\checkmark				
	5.	F005		_				_/_	
			Appendix A to			ther the fa	cility is		
В.	Cali	Liquid hazardo any solid or slu concentrations	ous waste (includge) that cont	uding f	ree liquid e followir	マ。 s associate ng metals a	d with	1ANDLED	AT
			Ge	•	Treat	Store	Disp.	Trans.	
		Arsenic	500 mg/L	·					
		Cadmium	100 mg/L						
		Chromium VI	500 mg/L						
		Lead	500 mg/L						
		Mercury	20 mg/L						
		Nickel	134 mg/L				· · · · · · · ·		
		Selenium	100 mg/L				(* ****** **		
								•	

2.	Liquid hazar any solid or concentration	sludge) that	contains f	ree cyanid	es at	d with	
			Gen.	Treat	Store	Disp.	Trans.
3.	Liquid hazar	dous waste	that has a	pH of less	than or eq	ual to 2.0	
4.	Liquid hazar than or equa	l to	that contain	ns PCBs at	t concentra	tions great	er
		e facility m s PCBs with			es?		
	If yes,	state reasons				NA	
5.	Liquid hazar greater than than 10,000	or equal to					
	Note: The p waste is also specific HOC	subject to t	of 268.32(a he solvent)(3) and (e restriction) do not ag s of 268 Si	oply if the ubpart C of	HOC r a
			u ,				
						e p)

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

•		lvent Wastes: Does the opriate treatability gro			rmine the	
		<u> </u>	Yes	No	NA	
	If y	es, check the appropriat	e treatabi	lity group.		
		Wastewaters containin by weight) Pharmaceutical waster spent methylene chlor All other spent solven	vater cont ide		qual to 1% TOC	
<u>.</u>	Cali	fornia List Wastes: Doc appropriate treatment s	es the general	erator correctly f the waste?	y determine No CAL	TFCR HA
	a.	For liquid hazardous concentrations greater 500 ppm, is the treatm existing TSCA therma burning in high efficiencineration (40 CFR	than or elent in according to the contract of	qual to 50 but cordance with it regulations f	less	
			Yes	No	NA	
		If yes, specify the me	thod:			
	b.	For liquid hazardous concentrations greater the waste incinerated approved alternate me	than or e	qual to 500 pp d of by other	m, is	
			Yes	No	NA	
		If yes, specify the mer submitted a written re Administrator or Assis exemption from the in	quest to t	he Regional inistrator for a	•	

В.	W	a	ste	Ana	lysis

1.	1-30	pront wastes
	a.	Does the generator determine whether the F-solvent waste exceeds treatment standards?
		Yes No NA
		How was this determination made?
		- Knowledge of waste
		No
		If yes, note how this is adequate: LAB ANALYSIS IS ZER- FERMED (W/O TCLP)
		- TCLP Yes No
		If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	b.	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?
		✓ Yes No NA
		If yes, specify the waste stream: HAZARDOUS WASTE FUEL
	c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
		Yes No NA
	đ.	How does the generator test F-solvent waste when a process or waste stream changes?
		CA STIE LAB TESTS INCOMING LEADS AND PERFORMS BLENDING CALCULATIONS TO DETERMINE RESULTING COM
		CENTRATIONS IN FINAL PRODUCT
		N
2.	Cal	fornia List Wastes
	a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
		Yes No NA
		6 Revised 11-03-87

b.			determined added to the			ording to	PFLT,
			Yes		_ No		NA
	Check added	the type	bsorbent is s of waste t zardous wa qual to 2	o which a	bsorbent		
		greater th	zardous wa an or equal 10,000 mg/I	to 1,000	_		centrations
		Liquid ha	zardous wa	ste contai	ning meta	als	
		Liquid ha	zardous wa	ste contai	ining free	cyanide	es
c.	extra	ct or filtr or wheth	ator determ ate) in the v er the wast	vaste equ	al or exce	ed the p	
	-	Knowledg	ge of wastes				
			Yes	<u>-</u>	No ite:		NA
						, .	······································
	-	Testing	Yes		No		. NA
		If yes, lis	t test metho	d used:			
d.			ator determ and metals				in PFLT extract
			Yes		_ No		
	-]	If yes, lis levels tha	t test metho	d used an prohibitio	d constitu n levels:	uent and	concentration
e.		the generated the the generated the the generated the generated the the generated the	ator dilute (r adequate
			Yes	<u> </u>	_ No		, NA

Maı	1agem	<u>ent</u>
1.	On-S	Site Management
		aste that exceeds the treatment standards treated, stored, isposed on-site?
		Yes No
	If y	es, the TSD Checklist must be completed.
2.	Off	-Site Management
	a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
		Yes No
		If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
		Yes No
		If yes, does notification contain the following?
		EPA Hazardous waste number(s) Yes No
		Applicable treatment standards Yes No
		Manifest number Yes No
		Waste analysis data, if available Yes No
		Identify off-site treatment or storage facilities: CONTIDENTAL CEMENT (HANTRAL, Mc.) AND SYSTECH (GREEN PATLE, IN)
	b.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
		YesNo
		If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
		Yes No

C.

EPA Hazardous waste number(s) Yes No Applicable treatment standards Yes No Manifest number Yes No Waste analysis data, if available Yes No Certification that the waste meets treatment standards Yes No Identify off-site land disposal facilities: c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]? Yes No No NA NOT SUBJECT Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) Are treatment residuals generated from units or processes exempt under RCRA 264/265? Yes No If yes, list types of waste treatment units and processes:		If yes, does notification contain the fol	lowing?	
Manifest number	,	EPA Hazardous waste number(s)	Yes	No
Waste analysis data, if available		Applicable treatment standards	Yes	No
Certification that the waste meets treatment standards		Manifest number	Yes	No
meets treatment standards		Waste analysis data, if available	Yes	No
c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]? Yes No NA NA NOT SUBJECT Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) Are treatment residuals generated from units or processes exempt under RCRA 264/265? Yes No			Yes	No
(e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]? Yes No NA		Identify off-site land disposal facilities	:	
Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) Are treatment residuals generated from units or processes exempt under RCRA 264/265? Yes No	c.	(e.g., solvent-water mixtures less than 1 (268.5), or petition (268.6), does the gen- provide notification to the off-site disp that the waste is exempt from land disp	%), extension erator oosal facility	
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) Are treatment residuals generated from units or processes exempt under RCRA 264/265? YesNo		Yes N	10 10	NA NOT SUBJE
under RCRA 264/265? YesNo				
	(i.e., boil treatme	ers, furnaces, distillation units, wastewatent tanks, elementary neutralization, etc.)	er	
	(i.e., boil treatme	ers, furnaces, distillation units, wastewatent tanks, elementary neutralization, etc.) treatment residuals generated from units der RCRA 264/265?	s or processes ex	empt
	(i.e., boil treatme Are und	ers, furnaces, distillation units, wastewatent tanks, elementary neutralization, etc.) treatment residuals generated from units der RCRA 264/265? Yes	s or processes ex	empt
	(i.e., boil treatme Are und	ers, furnaces, distillation units, wastewatent tanks, elementary neutralization, etc.) treatment residuals generated from units der RCRA 264/265? Yes	s or processes ex	empt
	(i.e., boil treatme Are und	ers, furnaces, distillation units, wastewatent tanks, elementary neutralization, etc.) treatment residuals generated from units der RCRA 264/265? Yes	s or processes ex	empt

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	Yes No
	If yes, check the appropriate regulatory status: Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
В.	Does the transporter mix, combine, or recontainerize wastes?
	YesNo
C.	Is the waste treated in an exempt treatment process on-site?
	Yes No
	N

RCRA LAND DISPOSAL RESTRICTION INSPECTION TSD CHECKLIST

TSD REQUIREMENTS

1.	Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?
	o F-solvent Yes No NA
	o California List Yes No/ NA
2.	Does the facility obtain representative chemical and physical analyses of wastes and residues?
	Yes No
	a. What date was the waste analysis plan last revised? Date UNKNOW
	b. Are analyses conducted on-site or off-site?
	✓ On-site ✓ Off-site
	Identify off-site lab: EMS LABORATORIES (DARTEN, IL.)
	c. Is F-solvent waste analyzed using TCLP?
	Yes No NA
	d. Describe the frequency of sampling: Each SHIPMENT
	e. Describe procedures used to identify manifest discrepancies: FINGERPRINT ANALYSIS AND UTSUAL COMPARISO WITH PREACCEPTANCE ANALYSIS AND PHYSICAL I
3.	Are the operating records, including analyses and quantities,
	3

Sto	rage (268.50)
1.	Are restricted wastes stored on-site?
	Yes No
	If no, go to C, Treatment in Surface Impoundments.
2.	If yes, check the appropriate method.
	Tanks Containers
3	Are all containers clearly marked to identify the contents and date(s) entering storage?
	Yes No NA
	DATES ENTERING STORAGE ARE NOT MARKED ON COM
	TAINERS
	Yes No
5.	Do operating records agree with container labeling?
	Yes No NA
6.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No
	If yes, state how:

Revised 11-03-87

7.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?
	Yes No
8.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? Yes No NA
	RECORDED IN OPERATING BECCED
	·
<u>Tre</u> 1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No
`	Does the facility treat restricted wastes other than in surface
`	Does the facility treat restricted wastes other than in surface impoundments? Yes No
1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. Describe the treatment processes: FUEL BLENDING TO PRODUCE HARARDOUS WASTE FUEL Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards
1. 2. 3.	Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. Describe the treatment processes: FUEL BLENDING TO PRODUCE HARARDOUS WASTE FUEL Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No ADDUMED TO EXCEED TREA
1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. Describe the treatment processes: FUEL BLENDING TO PRODUCE HAZARDOUS WASTE FUEL Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No PRODUCE HAZARDOUS WASTE FUEL No STANDARDS Describe frequency of testing treatment residuals: BLENDING CALCULATIONS FROM INFORMATION OBTAINED FROM RECEIUTING ANALYSIS ARE PERFORMED FOR
1. 2. 3.	Does the facility treat restricted wastes other than in surface impoundments? YesNo If no, go to D, Treatment in Surface Impoundments. Describe the treatment processes: FUEL BLENDING TO PRODUCE HARARDOUS WASTE FUEL Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No STANDARDS Describe frequency of testing treatment residuals: BLENDING CALCULATIONS FROM INFORMATION CRITAINED FROM RECEIUTING ABALYSIS ARE PERFORMED FOR EVERY SHIPMENT SENT CEF SITE
1. 2. 3.	Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. Describe the treatment processes: FUEL BLENDENG TO PRODUCE HAZARDOUS WASTE FUEL Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No PASSUMED TO EXCEED TREATIONS FROM TO EXCEED TREATIONS FROM TO EXCEED TREATIONS FROM TOPERMENTED ESTAINED FROM RECEIUTION ADALYSTS ARE PERFORMED FOR

13

6.	Are notifications prepared by the generators kept in the facility's operating record? Yes No
7.	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
	Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility?
	Yes No
	If yes, does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
	Identify off-site disposal facilities:
Tre	atment in Surface Impoundments
1.	Are restricted wastes placed in surface impoundments for treatment?
	Yes
	If no, go to E, Land Disposal.
2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
	Yes No

D.

3.		e minimum technology requirements have not met, has a waiver been granted for that unit?
		Yes No
4.	from	representative samples of the sludge and supernatant the surface impoundment tested separately, ptably, and in accordance with the sampling frequency analysis specified in the waste analysis plan?
		Yes No
	Atta	ch test results.
5.		he hazardous waste residues (sludges or liquids) ed the treatment standards specified in 268.41?
		Yes No
6.		ride the frequency of analyses conducted on treatment
7.		s the operating record adequately document the results vaste analyses performed in accordance with 268.41?
		Yes No
8.	treat	the hazardous waste residues that exceed the timent standards (268.41) removed adequately and n annual basis?
		Sludge Yes No
		Supernatant Yes No
	а.	If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?
		Yes No
	b.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
		Yes No

			e residues su poundment?	bsequently Yes				er surface	2	
		d. Ar	e residues tro	eated prior	to di	sposal	?			
				Yes	;		No			
		If	yes, are wast	e residues	treate	d on-s	ite or o	off-site?		
	•			On-	site		Off-si	te		
		Ide	entify treatm	ent method	d:					
E.	Lar	d Disposa	<u>.1</u>							
	1.	landfills	tricted wastes s, surface impalt domes/bec	poundment	s was	te pile	s, wells	, land tre		·
			. •	Yes	5	_/	No			
		Note:		clude surfa E Impounda			ments	addressed	l in D, Tr	eatment
		If yes, s received	specify which	units and		_			·	
	2.		e facility ope ors/storer/tre					nd certifi	cations fr	om
				Yes	3		No			
	3.	to the w	e facility obt vaste analysis ble treatment	plan) to d	leterm [268.7	ine th (c)]?	at the			
		If yes, a	at what frequ							·
						<u></u>				<u> </u>

4.	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]? Yes No
5.	Does the facility dispose of restricted wastes that are subject to a national capacity variance?
	Yes No
	If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)? Yes No
6.	Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?
	Yes No NA
7.	What is the volume of the restricted wastes disposed of to date?
8.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports? Yes No NA

	Facility:	tetroc	hem Serv	rices Inc.	
	U.S. EPA	A I.D. No.:			
	Street:	NE Co	anal Bank	Road	
	City:	Lemont	State:	IL	Zip Code: <u>60439</u>
	Telephor	ne: <u>312</u>	1739-115	0	
	Operator	r: <u>Petrach</u>	em Servic	ces Inc.	
	Street:	NE Ca.	nal Bank i	Road	
	City:	Lemont	State:	ZL	Zip Code: <u>6.0439</u>
	Telephor	ne: 312/	739-115	0	
	Owner:	Metropoli	tan Sanite	any District	
	Street:				,
	City:		State:		Zip Code:
	Telephor	ne:	<u> </u>		
	Inspectio	on Date:	c:	Weather Con	iditions: 20° Sunny
		<u>Name</u>	Afi	<u>filiation</u>	Telephone
	Inspector	rs: <u>John</u>	Müher :	IEPA	312/345-9780
					·
	Facility	Representatives:	Jack Paul 7	Bogner	312/739-1150
				n Hansen	317/241-9406
			RCRA Status	<u>F-Solvent</u>	DR Status California List
5		Generator	<u>X</u>	X	
or Vaste		Transporter	<u>X</u>		
FICE		Treater	<u> </u>		RECEIVED
geme		Storer	<u> </u>	<u>X</u>	<u>AUG</u> 1 2 1988
OFFICE OF RCRA Waste Management Division	E V E	Disposer			IEPA-DLPC
ğ. G				1	Revised 11-03-87

INSPECTION SUMMARY

The land restricted waster received at this site typically are incorporated into hatardow waste fuel. Some is stored temporarily and then shipped off site for incorporation.

The following apparent violations were observed at the time of the inspection:

- 1) Dates entering storage are not marked on containers of restricted waste.
- 2) Operating record does not indicate the quantity of restricted waste at each container storage area.

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GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

1.			Does the gener bility group of			ermine t	he		
			X Yes	-	_ No		NA		
	If y	es, check the	appropriate trea	tability	group.				
		by weight) Pharmaceuti	containing solv cal wastewater ene chloride nt solvent wast	containi		equal to	1% TO	С	
2.	Cali the	ifornia List Wa appropriate tr	astes: Does the catment standa	generate rd of the	or correct e waste?	ly detern	nine . No	Cal	tornia L
	a.	concentratio 500 ppm, is existing TSC burning in h	azardous waste ns greater than the treatment in A thermal trea- igh efficiency (40 CFR 761.70	or equal accord timent reboilers (l to 50 bu ance with gulations	t less for			
			Yes	-	_ No		NA		
		If yes, specif	y the method:						
	b.	concentration the waste in	azardous waste ns greater than cinerated or dis ernate methods	or equal posed of	to 500 p by other	pm, is			
			Yes		_ No		NA		
			y the method a written request			the facil			רילוזי
		Administrato	or or Assistant a	Adminis	trator for		K	ECE	EIVED
		enemption i		111011 100	141101110111	•	Al	JG 1	2 1988
							ŢĒ	PA.	DLPC

			GEN
В.	Was	te An	n <u>alysis</u>
	1.	F-S	olvent Wastes
		a.	Does the generator determine whether the F-solvent waste exceeds treatment standards?
			No NA
			How was this determination made?
			- Knowledge of waste
			No
			If yes, note how this is adequate: Lab analysis is performed but not TCLP.
			- TCLP Yes X No
			If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		b.	Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? Yes No NA
			If yes, specify the waste stream: Hazardous Warte Fuel
		c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
			Yes No NA
		đ.	How does the generator test F-solvent waste when a process or waste stream changes? On site Lab fests the incoming loads and does
			in the final product.
			RECEIVED
	2.	Cali	ifornia List Wastes AUG 1 2 1988

____ Yes ____ No ___

according to the Paint Filter Liquids Test (PFLT method 904E)Pas-DLPC

Does the generator determine whether the waste is a liquid

X NA No Calif. List wastes: Revised 11-03-87

described by SW-846?

	-	Yes	No	NA	
What	type of abs	sorbent is used?	_	_	
Chec	k the types	of waste to whi		s	
adde		ardous waste ha	ving a pH less		
	than or equ		,		
	Liquid haza	ardous waste co	ntaining HOCs	in concentration	ons
	greater than less than 10	n or equal to 1,0	000 mg/L, but		
		<u> </u>			
	Liquid haza	ardous waste co	ntaining metal	S	
	Liquid haza	ardous waste co	ntaining free c	yanides	
Does	the generat	or determine w	hether the cond	centration level	s (not
extra	ct or filtrat	c) in the waste	equal or exceed	d the prohibition	n
	s or whether ion:	r the waste has	a pH of less th	an or equal to	2.0
	Knowledge	of wastes			
-	_				
	•	Yes	No	NA	
	If yes, note	how this is add	equate:		
					<u> </u>
	Testing				
•	Testing	Yes	No	NA	
	If wes list t	test method use.	ત∙		
	-	test method used			
	the generate	or determine if	concentration		extract
	the generated cyanide a	or determine if and metals conce	concentration entration levels	s?	extract
	the generated cyanide a	or determine if	concentration entration levels	s?	extract
xce	the generated cyanide a	or determine if and metals concerning. Yes test method used	concentration entration levels No d and constitue	s?NA ent and concent	ration
exce	the generated cyanide a	or determine if and metals concerning. Yes	concentration entration levels No d and constitue	s?NA ent and concent	ration
xce	the generated cyanide a	or determine if and metals concern Yes test method used exceeded prohib	concentration entration levels No d and constitue	NA NA concent	ration
exce	the generated cyanide a	or determine if and metals concernated Yes test method used exceeded prohib	concentration entration levels No d and constitue pition levels:	NA NA concent	ration
Does	the generated cyanide a If yes, list the levels that of	or determine if and metals concern Yes test method used exceeded prohib	concentration entration levels No d and constitue pition levels:	NA NA concent	ration REC
excee	the generated cyanide a If yes, list the levels that of the generatement [268.3]?	or determine if and metals concern Yes test method used exceeded prohib	concentration entration levels No d and constitue oition levels:	nt and concent	ration

Management
1. On-Site Management
Is waste that exceeds the treatment standards treated, stored, or disposed on-site?
Yes No
If yes, the TSD Checklist must be completed.
2. Off-Site Management
a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
Yes No
If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?
Yes No
If yes, does notification contain the following?
EPA Hazardous waste number(s) Yes No
Applicable treatment standards Yes No
Manifest number Yes No
Waste analysis data, if available Yes No
Identify off-site treatment or storage facilities: <u>Continental</u> <u>Cement in Hanibal</u> , MO.
b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
Yes No
If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? RECEIVED
Yes No AUG 1 2 198
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C.

c. If (e.g (26 protha res	Applica Manife	azardous waste n able treatment sta st number	•	Yes	No	
c. If (e.g (26 protha res	Manife		ndards	• •		
c. If (e.g (26 protha res		st number		Yes	No	
c. If (e.g (26 protha res	Waste a			Yes	No	
c. If (e.g (26 protha res		inalysis data, if a	vailable	Yes	No	i
c. If (e.g (26 protha res		cation that the w reatment standar		Yes	No	ı
(e.g (26 pro tha res	Identify off-	-site land disposa	l facilities: _		·	
· · · · · · · · · · · · · · · · · · ·	provide notif	etition (268.6), do fication to the of te is exempt from 268.7(a)(3)]?	f-site disposa land disposa	al facility al	Not su Na these	bje
		264/265 Exempt distillation units,	wastewater	ocesses		
		intary neutralizat	ion, etc.)			
If yes, li	tanks, eleme	iduals generated		processes e	kempt	

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TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	No
	If yes, check the appropriate regulatory status: Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
В.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
C.	Is the waste treated in an exempt treatment process on-site?
	YesNo

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TSD CHECKLIST

TSD REQUIREMENTS

A.

<u>Ger</u>	eral 1	Facility Standards		
1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?				
	o F	-solvent Yes No NA		
٠	o C	California List Yes NoNA		
2.	s the facility obtain representative chemical and physical analyses of tes and residues?			
		Yes No		
	a.	What date was the waste analysis plan last revised? Defe not Known		
	b.	Are analyses conducted on-site or off-site?		
		On-site Off-site		
		Identify off-site lab:		
	c.	Is F-solvent waste analyzed using TCLP?		
		Yes No NA		
	d.	Describe the frequency of sampling: Every shipment.		
	c.	Describe procedures used to identify manifest discrepancies: Finger print analysis and visual comparison to with preacceptance analysis and physical data.		
3.		the operating records, including analyses and quantities, plete [264.73/265.73]?		
		Yes X No RECEIVED		
		ALIG 1 2 1988		
		HEPA-DLPC		

Sto	rage (268.50)
1.	Are restricted wastes stored on-site?
	Yes No
	If no, go to C, Treatment in Surface Impoundments.
2.	If yes, check the appropriate method.
	Tanks Containers
3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
	Yes No NA
	Dates entering storage are not indicated.
4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
	Yes No
5.	Do operating records agree with container labeling?
	Yes No NA
6.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No
	If yes, state how:
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B.

4. Describe frequency of testing treatment residuals: Blending Calculations from information obtained from receiving analysis are performed for every shipment sent affects. 5. Is dilution used as a substitute for treatment? AUG 12 19		7.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
volume of waste removed from tanks annually equals or is more than the tank volume? Yes No 8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? Yes No NA Recorded M operating record. C. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to Produce paradeus waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment for years of the stanks. 4. Describe frequency of testing treatment residuals: Blending Calculations from information chromed from receiving analysis are performed for every shipment stanks. 5. Is dilution used as a substitute for treatment? AUG 12 19			Yes No NA
8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? Yes No NA Recorded in operating record. C. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Bleading to produce hazardens waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment form. Yes No exceed treatment standards. 1. Describe frequency of testing treatment residuals: Bleading Calculations from information obtained from receiving snalpsin are performed for every shipment sent. All 12 19			volume of waste removed from tanks annually equals or is more than the tank volume?
the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record? Yes No NA Recorded in operating record. Treatment 1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards [268.7(b)]?			<u>7 </u>
1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards. 1. Describe frequency of testing treatment residuals: Blending Calculations from information obtained from receiving analysis are performed for every shipment sent after side. 5. Is dilution used as a substitute for treatment? AUG 12 19		8.	the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating
1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards. 1. Describe frequency of testing treatment residuals: Blending Calculations from information obtained from receiving analysis are performed for every shipment sent after side. 5. Is dilution used as a substitute for treatment? AUG 12 19			Yes No NA
1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards 1. Describe frequency of testing treatment residuals: Blending calculations from information obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 1219			Recorded in operating record.
1. Does the facility treat restricted wastes other than in surface impoundments? Yes No If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards 1. Describe frequency of testing treatment residuals: Blending calculations from information obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 1219		Tre	atment
If no, go to D, Treatment in Surface Impoundments. 2. Describe the treatment processes: Blending to produce hazardow waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards 4. Describe frequency of testing treatment residuals: Blending calculations from information obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 1219	J .		
2. Describe the treatment processes: Blending to produce hazardou waste fuel. 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes X No exceed treatment standards 4. Describe frequency of testing treatment residuals: Blending Calculations from information obtained from receiving analysis are performed for every shipment sent of side. 5. Is dilution used as a substitute for treatment? AUG 1219			
 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes X No exceed treatment standards 4. Describe frequency of testing treatment residuals: Blending Calculations from Information Obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 12 19 			If no, go to D, Treatment in Surface Impoundments.
 3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes X No exceed treatment standards 4. Describe frequency of testing treatment residuals: Blending Calculations from Information Obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 12 19 		2.	Describe the treatment processes: Blending to produce hazardow waste fuel.
analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]? Yes No exceed treatment standards Lending Calculations from information obtained from receiving analysis are performed for every shipment sent. 5. Is dilution used as a substitute for treatment? AUG 12 19			
4. Describe frequency of testing treatment residuals: Blending Calculations from information obtained from receiving analysis are performed for every shipment sent of site. 5. Is dilution used as a substitute for treatment? AUG 12 19		3.	analysis plan, determine whether the residue from all treatment processes is less than treatment standards
, i.e		4.	
Yes No IEPA-DLP		5.	Is dilution used as a substitute for treatment? AUG 1 2 1988
			Yes \times No IEPA-DLPC

6.	Are notifications prepared by the generators kept in the facility's operating record? Yes No
7.	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
	Yes No NA
	If yes, does the treatment facility provide notification and certification to the disposal facility?
	Yes No
	If yes, does notification contain the following?
	EPA Hazardous waste number(s) Yes No
	Applicable treatment standards Yes No
	Manifest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets the treatment standards Yes No
	Identify off-site disposal facilities:
Tre	atment in Surface Impoundments
1.	Are restricted wastes placed in surface impoundments for treatment?
	YesNo
	If no, go to E, Land Disposal.
2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water
	monitoring requirements? RECEIVED
	monitoring requirements? —— Yes —— No AUG 1 2 1988

D.

3.		he minimum technology requirements have not n met, has a waiver been granted for that unit?	
		Yes No	
4.	from	representative samples of the sludge and supernatant in the surface impoundment tested separately, eptably, and in accordance with the sampling frequency analysis specified in the waste analysis plan?	·
		Yes No	
	Att	ach test results.	
5.		the hazardous waste residues (sludges or liquids) eed the treatment standards specified in 268.41?	
		Yes No	
6.		vide the frequency of analyses conducted on treatment dues:	
7.		es the operating record adequately document the results waste analyses performed in accordance with 268.41?	
		Yes No	
8.	trea	the hazardous waste residues that exceed the tment standards (268.41) removed adequately and an annual basis?	
		Sludge Yes No	
		Supernatant Yes No	
	a.	If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?	
		Yes No	
	b.	Are adequate precautions taken to protect liners, and	RECEIVED
		do records indicate that liner integrity is inspected?	AUG 1 2 1988
		Yes No	IEPA-DLPC Revised 11-03-87

		Are residues subsequently managed in another surface impoundment?
		Yes No
	d.	Are residues treated prior to disposal?
		Yes No
		If yes, are waste residues treated on-site or off-site?
		On-site Off-site
		Identify treatment method:
		•
Lan	nd Dis	nosal
1.	A re	restricted wastes placed in land disposal units such as
1.	lanc	Ifills, surface impoundments waste piles, wells, land treatment
	unit	ts, salt domes/beds, mines/caves, or concrete vault or bunker?
		Yes No
	Note	 ·
	If y	e: Do not include surface impoundments addressed in D, Treatment
2.	If y rece	e: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments. es, specify which units and what wastes each unit has
2.	If y rece	e: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments. es, specify which units and what wastes each unit has gived: es the facility operating record have notices and certifications from
2.	If y rece	e: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments. es, specify which units and what wastes each unit has sived: es the facility operating record have notices and certifications from erators/storer/treaters [268.7(c); 268.7(a),(b)]?
	Doe gene	e: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments. es, specify which units and what wastes each unit has sived: es the facility operating record have notices and certifications from erators/storer/treaters [268.7(c); 268.7(a),(b)]? ———————————————————————————————————
	Doe gene	e: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments. es, specify which units and what wastes each unit has eived: es the facility operating record have notices and certifications from erators/storer/treaters [268.7(c); 268.7(a),(b)]? ———————————————————————————————————
	Doe gene	e: Do not include surface impoundments addressed in D, Treatmen in Surface Impoundments. es, specify which units and what wastes each unit has sived: sthe facility operating record have notices and certifications from erators/storer/treaters [268.7(c); 268.7(a),(b)]?

Revised 11-03-87

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4.	If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?
	Yes No
5.	Does the facility dispose of restricted wastes that are subject to a national capacity variance?
	Yes No
	If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)? Yes No
6.	Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?
	Yes No NA
7.	What is the volume of the restricted wastes disposed of to date?
8.	If the facility has a case-by-case extension, is the facility making progress as described in progress reports?
	Yes No NA

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LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
Continental Cement Hanibal, MO MODO54018288	Cement Kiln	F001 F002 F003 F005	45,000 gallons per month	Shipped three times a week.

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RCRA Checklist for Inspection of Hazardous Waste Fuel Marketers/Processors:

Nam	e of Facility:	Petrochem Services, Inc.			
Add	ress:	Canal Bank Road, NE			
		Lemont, IL 60439			
EPA	Waste Fuel I.D	. Number:			
Fac	ility Inspectio	n Representative: <u>Mr. Jack Bogne</u>	r		
Tit	le:	Plant Manager			
Tel	ephone:	(312) 739-1150			
*Sp	ecify NA if que	stions do not apply.			
	e Characterizat		yes	no	comments:
1.	Does the facil	ity accept hazardous waste?	<u>x</u>		
2.		ity blend hazardous waste to be marketed as fuel?	x		sold as hazardous waste fuel
3.		ity accept hazardous waste ed oil previously blended waste?		x	deal directly with generators; own col- lection trucks
4.	Does the facil hazardous wast	ity only accept characteristic e?		<u> </u>	F1, 2, 3, 5 blended to hazardous waste fuel (F wastes are a majorit
	solely because waste is subje	d for energy recovery that is haza it exibits a characteristic of ha ct to regulations under Subpart E . Refer to the Used Oil Fuel Marka))	zardous rather	klist.	(masses are a major re
5.		ity only accept non-hazardous o, refer to the Used Oil Fuel list.		<u> x</u>	
6.		ity generate hazardous waste? o generator checklist.	<u> </u>		residual sludges from paints, caustic sludger from barges (2 yrs. a
7.	Does the facil	ity accept only used oil?			
8.	Specify other i	material recycled as fuel.			

<u>High Btu, low flash wastes from aerosol can shredder (hair spray, polishes) blended</u> into hazardous waste fuel.

9.	Check the fo	llowing general oper	rating	practices:				
Sto	orage		Trea	tment			Dispos	al
	C_ Drum	•	X_	Settling			L	andfill
	Above-ground	tank(s)	x	Heat additi			L	and Treatment
	Underground	tank(s)	X	In-Line Fil	exte tering	rnal		urface
X	Other (roll	offs not for HW)		Cerifugatio	n		1	mpoundment
	_ Tank sizes		X_	Screen Filt	ration		0	ther
	railers (erosol cans	000174 non-haz 000173 D001	x	Dehydration Emulsion Broad				
	their waste a 1986? (§266.3	Neutralization pri ity notified the U.	or to S. EP y Jan	off-site. A of	yes	no	comment	<u> </u>
11.	storage of ha (§266.34(c))	ity submitted a Par ezardous waste by Ma A information:			x		see	lengthy Port A
12.	Specify waste	lity accept hazardo e and generator type fests for review)		ste?	X			
	Small Qua	antity Generators						
	(<10	00kg/m or 100 <u><</u>	1000	kg/m)				
	Large On	antity Generators						

	Specify waste t	ypes: <u>D001, F003, F005, F002, D002</u>	etc.	<u>as on</u> F	Part A.
13.	shipments of ha	ty have manifests for all zardous waste and blended fuel received and sent? (§265.70)	yes	no	comments:
14.	of §266.31(a)? fications from	ty comply with the prohibitions Review operating records, certi- burners and invoices. If available er list from the facility.	e <u>x</u>		Not available for inspection.
15.		ty have a copy of the <u>required</u> ners or marketers to whom waste d? (§266.34(e))	_ x		K-Five subsidiaries Dupage Materials
16.	or an operating	ty have invoice information record for shipments of used oil pecification used oil fuel?			Have not shipped used oil fuel since 7/87.
17.		ty analyze for metals, halogens ? (§266.43(b)(1))	<u>x</u>		See comments section.
	Specify methods	:			
18.	under §266.34(f	ty have the records required) i.e. copies of certifications d other marketers	X		Not available for inspection.
Note	subject to st 270, Subparts	markets hazardous waste fuel, the orage requirements of Parts 262, 20 A through L. Therefore, the RCRA TSD Facilities may be useful.	54 or 2	65 and	
Ins	pectors's Name:	Shirlee Brauer, Sue Rodenbeck, D	ave Tom	noten	
Tit	•	Environmental Engineer, Environmental		<u> </u>	- t, Headquarters
Age	ncy:	U.S. EPA			
0ff	ice Location:	230 S. Dearborn, Chgo., IL 60604			_
Dat	e of Inspection:	March 29, 1988			

Comments:

A total halogenated organic compounds (TOX) analysis is completed on the first and fourth shipments.

Arsen ic, sulfides, water, BS&W, pH, and API gravity tests are completed pre-shipment.

Once the waste is received, a fingerprint and PCB analysis is completed. The waste is held in the vertical tanks labeled 'VRT' on the plan until these analyses are complete.

Petrochem accepts crankcase oil from Midas Muffler, tank cleaning wastes, wastes from product tank spills, and spills from pollution control devices (oil/water separators).

Mr. Bogner, the plant manager, says they accept PCBs < 10 ppm for blending. He acknowledges that these fuels cannot be burned except in TSCA approved facilities.

Call Jay Longenecker of HES for notice from Petrochem to HES: (317) 243-0811.

RCRA Checklist for Inspection of Used Oil Fuel Marketers/Processors:

Name of Facility:	Petrochem Servio	ces, Inc., Chicago	Divisi	on	
Address:	P.O. Box 337				;
<u>.</u>	Lemont, IL 604	39			: Petrochem has not sold oil fuel since July, 1986.
EPA Waste Fuel I.	D. Number:	ILD-085-349-264			ochem has blended used oil in hazardous waste fuel and
Facility Inspecti	on Representative:	Mr. Jack Bogne	<u>r</u>		sent it to HES for marketing.
Title:	Plant Manager				
Telephone:	(312) 739-1150	·			
*Specify NA if qu	estions do not app	ly.			
Applicability					
in boilers or ind		Used oil includes	any fu		for energy recovery duced from used oil
			yes	no	comments:
1. Does the faci	lity accept hazardo	ous waste?	X		
2. Does the used oil contain > 1000 ppm of total halogens? If so, it is presumed to have been mixed with listed halogenated hazardous waste. (266.40(c))					cannot tell by operating record
Does the faci				х	accepts listed also
	lity only accept us rs or other sources			<u>x</u>	
5. Are other mat	erials recycled for	energy recovery?	x		
6. Check the fol	lowing applicable o	operating practices	s:		-
Storage		Treatment			Disposal
X Drum		<u>★</u> Settling			Landfill
🔏 Above-ground	tank(s)	<u></u> ★ Heat addition	on		Land Treatment
Underground	tank(s)	In-Line Filt	tering		Surface Impoundment

X Other rolloffs, not used for HW	Cerifugation	n		
Tank sized	X Screen Filt	ration		Other
trailers	Dehydration			
aerosoi cans	Emulsion Bre	eaking		
	X Blending			
Descriptions and Observations:				
7. Has the facility notified the U.S. their waste as fuel activities by 1986? (§266.43(b)(3))		yes _×_	no	comments:
Specify Notification Information:				
8. Has the facility submitted a Part storage of hazardous waste?	A for			see lengthy Part
Specify Part A information:				
9. Does the facility generate hazardo If so, refer to generator checklis		X		
10. Does the facility market only to be or other marketers who have notific (§266.43(b)(2))				
11. Does the facility have manifests for shipments of hazardous waste received. sent? (§265.70)		<u>x</u>		
12. Do invoices contain the following	information (§26	6.43(b)	(5));	0-1 1 6 11-5
(i) An invoice number; (ii) Marketer's EPA ID number a	and Possivan's	<u> x</u>		Only buy from HES. Only send to HES.
EPA ID Number; (iii) Names and addresses of sh		<u>x</u>		
receiving facilities; (iv) Quanity of off-specificat		<u>x</u>		
delivered;	ion ruer being	<u>x</u>		

	(v) Date o	f shipment or delivery; and	yes x	no	comments:	
	(vi) Statem	ent - "This used oil is subject regulation under 40 CFR Part 266"	x			
13.		ty have copies of invoices nt for the pase three years?	_x_		have not thrown any	out
-14.	notices from bu	ty have copies of required rners and other marketers, nt? (§266.43(b)(5))			Not available for inspection.	
15.	Does the facili meet the specif	ty first claim the used oil ications?		<u>X</u>		
16.	or other inform	ty have records of analyses ation used to claim the used pecifications? (§266.43(b)(1))			NA	
17.		ty have a record or operating for <u>each</u> shipment ; (§266.43(b)(6)((i))			
	A. Name and	address of receiving facility;			NA	
	B. Quanity	of used oil fuel delivered;				
	D. Cross-re	delivery or shipment; ference to records of used oil or other information?				
Ins	pectors's Name:	Shirlee Brauer, Sue Rodenbeck, Da	ve Tomp	ten		
Tit	le:	Environmental Engineer, Environme	ntal Sc	<u>cientist</u> ,	Headquarters	
Age	ncy:	U. S. EPA				
0ff	ice Location:	230 S. Dearborn St., Chicago, IL	60604			
Dat	e of Inspection:	March 29, 1988			•	

Comments:

STATE IDENTIFICATION NUMBER (If Applicable)

EPA IDENTIFICATION NUMB

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A - General Facility Standards

I. General Information:

(A·)	Facility	Name: Pc	trochem	Service	Inc.
		•			
		•			(E) Zip Code: <u>6043</u> 4
(F)	Phone: .	312/257-58	7.5 (G)	County:	Cook
(H)	Operator	:	(SAME)		
			·		
					(L) Zip Code
(M)	Phone:		(N) C	County:	·
(0)	Owner:		(SAME)		
(P)	Street:				
					(S) Zip Code:
(T)	Phone:		(U)	County:	
(V)	Date of	Inspection:	(W) Tin	ne of Inspecti	on (From) <u>9:15 mm</u> (To) <u>11:30</u> 6
(X)	Weather	Conditions: <u>55</u>	•		•

(Y)	Person(s) Interviewed	Title	Telephone		
	MARION O. CASE	MANAGER Tech Sep.	3/12/257-5875		
(Z)	Inspection Participants BRAD Benning	Agency/Title IFPA/ Env. Sp	Telephone 345-9780		
(AA)	Preparer Information				
	Name Brao Benning	Agency/Title IEPA/Env. Sp.	Telephone 345-9780		
	Complete sections I through VII for facilities. Complete the forms (in to the site activities identified in	n parenthesis) in section VI	d/or disposal II corresponding		
XA	 Storage and/or Treatment 1. Containers (I) 2. Tanks (J) 	D. Incineration and/ (O and P)	or Thermal Treatment		
	 Surface Impoundments (K) Waste Piles (L) 	X E. Chemical, Physica Treatment (Q)	l, and Biological		
B		OMITTED PAGES	11-17, 21		
·	·		,		

 $\frac{\text{Note:}}{\text{IX}}$ If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDAR (Part 265 Subpart B)

•			Yes	No ·	NI*	Remark
(A)		the Regional Administrator notified regarding:				
	1.	Receipt of hazardous waste from a foreign source?		1		
	2.	Facility expansion?		<u> </u>	 .	
(B)	Gen	neral Waste Analysis:	~			·
	1.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u> </u>			supplied by generator or will send out analysis to Lab.
	2.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u> </u>			HAVE VERY general plan, due to nature of husiness.
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u> </u>			
(C)	Sec	curity - Do security measures include (if applicable)	:		•	
	1.	24-Hour surveillance?		\checkmark		<u> </u>
	2.	Artificial or natural barrier around facility?	<u>~</u>			FencE
	3.	Controlled entry?	\checkmark			Cates.
	4.	Danger sign(s) at entrance?		<u>✓</u>		•
(D)		Owner or Operator Inspections clude:				
-	1.	Records of malfunctions?		<u>~</u>		FACILITY HAS
	2.	Records of operator error?		<u>~</u>		Rough drAFTS
	3.	Records of discharges?		<u> </u>		RCADY, FINAL

III GENERAL FACILITY STANDARDS - Continued

		·	Yes	No	NI*	Remarks
	4.	Inspection schedule?		X	***	FORMS Still
	5.	Safety, emergency equipment?	•••	1		need revillons
	6.	Security devices?		1	***	*************
	7.	Operating and structural devices?		1		*******
	8.	Inspection log?		1		***********************
(E)		personnel training records lude: (Effective 5/19/81)		ı		
	1.	Job titles?	X	•••	***	Supervisor and
	2.	Job descriptions?	<u>/</u>		***	Lead ocopie have
	3.	Description of training?	برکد		•••	been to Safety Semmans.
	4.	Records of training?	×		***	Company Safety
	5.	Have facility personnel received required training by 5-19-81?	¥.	***	•••	manual, given to
	6.	Do new personnel receive		•		all employees.
		required training within six months?	×	•••	•••	Monthly Safety +
(F)	rec	required are the following special quirements for ignitable, reactive, or compatible wastes addressed?				on- Job TRAINING
	1.	Special handling?	1	•	•••	*****
	2.	No smoking signs?	<u></u>			**************
	3.	Separation and protection from ignition sources?	/	•		

IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

(A)	Maintenance and Operation of Facility:	Voc No NT+	Damauka
٠	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	Yes No NI*	Remarks
(B)	If required, does the facility have the following equipment:	e e	•
	Internal communications or alarm systems?	<u> </u>	SMALL AREA, VISUAL
	2. Telephone or 2-way radios at the scene of operations?	<u> </u>	RADIOS - TEIFPHONES
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>	Extinguishers - portable wheel conts. Numerous spill equip.
	Indicate the volume of water and/or for Unlimited supply from foam on site	n canal -	re control: Small amount
(C)	Testing and Maintenance of Emergency Equipment:		
	Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u> </u>	In-house inspection and annual ispections
	2. Is emergency equipment maintained in operable conditions?	<u> </u>	of fire equip. plus monthly inspections.
(D)	Has owner or operator provided immediate access to internal alarms? (if needed)	<u> </u>	

Not Inspected

(E)	Is there adequate aisle space	
	for unobstructed movement?	

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A)		s the Contingency Plan contain the lowing information:	Yes No	NI*	Remarks
	1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)			FINAL PLAN not
	2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?			Orafted. FACILITY 15 IN the Emerg. Response business and is CAPABLE
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		<i></i>	of handling spills. FACILITY Cannot predict what
	4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<u>~</u>		tupes of waste it may incounter. Facility does work
	5.	An evacuation plan for facility personnel where there is a possibilithat evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	ty 		with local Fire Depts. very closely. Usually Fire Dept. Calls them for asistance.

		Yes No	NI*	Remarks
(B)	Are copies of the Contingency Plan available at site and local emergency organizations?		<i>_</i>	
(C)	Emergency Coordinator			
	1. Is the facility Emergency Coordinator identified?	<u> </u>	···	·
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>		
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	∠_		
(D)	Emergency Procedures			
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			No Emagencies AT FACILITY
	VI. MANIFEST SYSTEM, RE (Part 269			·
	(1010 200	Yes No	·	Remarks
(A)	Use of Manifest System	103 11	J 111	
	1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	∠_		
	2. Are records of past shipments retained for 3 years?			
(B)	Does the owner or operator meet requirements regarding manifest discreps#6ies?	<u>/</u> _	.!	

*Not Inspected

. V. CONTIL CY PLAN AND EMERGENCY PROCEDU - Continued

VI. RECORDKEEPING - Continue

:)	Onerati	ng Record		' .
,	1. Doe mai	s the owner or operator ntain an operating ord as required in .73?	<u> </u>	
	con	s the operating record tain the following ormation:		
	**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	<u> </u>	
	C•	The location and quantity of each hazardous waste within the facility?	<u> </u>	
	***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest		
		number, if waste was accompanied by a manifest.)		No DUPOSAL
	e. `	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<u> </u>	·
	f.	Reports detailing all incidents that required implementation of the Contingency Plan?	<u> </u>	
	g.	All closure and post closure costs as applicable? (Effective 5-19-81)		

^{**} See page 33252 of the May 19, 1980, Federal Register.

^{***} Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

				•		•
	•		Yes	No	NI*	Remarks
(A)	C10:	sure and Post Closure				
	1.	Is the facility closure - plan available for inspection by May 19, 1981?		<u> </u>		
	2.	Has this plan been submitted to the Regional Administrator		<u> </u>		Closure not ANTICAME
	3.	Has closure begun?		<u>~</u>		
	4.	Is closure estimate available by May 19, 1981?		<u> </u>		
(B)	Pos	t closure care and use of property				
	a p	the owner or operator supplied ost closure monitoring plan? fective by May 19, 1981)			· · ·	
		<u>VIII. FACI</u> (Part 265, Su				
		USE AND MANAGEM	I ENT (OF CON	TAINERS	
Faci	lity	Name: <u>Petro-Chem</u>		Da1	te of I	nspection: 10-27-Pl
			Yes	No	NI*	Remarks
	1.	Are containers in good condition?	<u> </u>	_		
	2.	Are containers compatible with waste in them?	V			
	3.	Are containers stored closed?	~			
		Are containers managed to prevent leaks?	1			Daily checks
	5.	Are containers inspected weekly for leaks and defects?	1/			
	6.	Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive)	V			(Ignitable)

7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u> </u>
	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u> </u>
		J TANKS
acili	ty Name: <u>Petro-Chem</u>	Date of Inspection: 10-27-8/
1	Are tanks used to store only those wastes which will not cause corrosi leakage or premature failure of the tank?	
2	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other contain∉ment structures?	Inspection. But are using Y Trave Travers for
3	Do continuous feed systems have a waste-feed cutoff?	Storage while Tant farm is
4	Are waste analyses done before the tanks are used to store a substan- tially different waste than before?	d
5	 Are required daily and weekly inspections done? 	V No Continuous feed
6	Are reactive & ignitable wastes in tanks protected or rendered non- reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	designated fa different, wastes.
	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u> </u>

Yes No

NI*

Remarks

IV.	0pen	Burni	i n q

A. Only complete this part if the facility open burns hazardous wast	Α.	Only	complete	this	part	if	the	facility	open	burns	hazardous	wast
--	----	------	----------	------	------	----	-----	----------	------	-------	-----------	------

		res	NO	NI*	Remarks	
1.	Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)					
2.	If this facility open- burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	· .			· :	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others						
0 to 100	380 m 530 m	670 1,250 1,730 2,260	ft ft				

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: Petro-Chem.					
Date	of Inspection: 10-27-81		·		•
		Yes	No	NI*	Remarks
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	<u>~</u>	,		
,	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)		¥		Not continuos Fred.

		Yes	No	NI*	Remarks
•	Has the owner or operator addressed the waste analysis requirements of 265.402?	¥			
4.	Are inspection procedures followed according to 265.403?	<u> </u>		·	· · · · · · · · · · · · · · · · · · ·
5.	Are the special requirements fulfilled for ignitable or reactive wastes?	<u>/</u>		· 	
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.)		/		·
Not	e: EPA has temporarily suspended the app waste regulations in 40 CFR Parts 122 wastewater treatment tanks that recei hazardous waste or that generate, sto is a hazardous waste where such waste 402 or 307(b) of the Clean Water Act tanks, transport vehicles, vessels, o hazardous only because they exhibit tor are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently s disposal.	ye, 264 ve, st ve, st ve or vaters (33 U. cont he con Subpan IX operat	and 20 treat s are s S.C. tainers rrosivert D of	55 to or and tre a wast subject 1251 et s which ity chaf 40 CF	wners and operators of (1) at wastewaters that are ewater treatment sludge which to regulation under Sections seq.) and (2) neutralization neutralize wastes which are racteristic under 40 CFR §261.2 R Part 261 only for this reason facility also generates
	1. MANIFE	ST RE	QUIREM	ENTS	•
		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	<u>~</u>	<u></u>		
(B)	Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)	·			
	1. Manifest document number?	V		•	
	 Name, mailing address, telephone number, and EPA ID Number of Generator 	· V			

	3.	Name and EPA ID Number of Transporter(s)?	<u> </u>	 · -	
	4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u></u>		·
	5.	The description of the waste(s) (DOT shipping name, DOT hazard class DOT identification number)?	· <u>✓</u>		
	6.	The total quantity of waste(s) and the type and number of containers loaded?	<u> </u>	-	
	7.	Required certification?	<u></u>		
	8.	Required signatures?	<u> </u>		
(C)		es the owner or operator submit ception reports when needed?	<u></u>		· · · · · · · · · · · · · · · · · · ·
		2. PRE-TRANSP	ORT REQUIRE	EMENTS	
(A)	wit (Re	waste packaged in accordance th DOT Regulations? equired prior to movement of zardous waste off-site)	<u> </u>		
(B)	in cor	e waste packages marked and labeled accordance with DOT regulations according hazardous waste materials?			,
		equired to movement of hazardous ste off-site)	<u> </u>		
(c)	If to	required, are placards available transporters of hazardous waste?	<u> </u>	·	

Yes

No

ΝI÷

Remarks

VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

			Yes	No	NI*	'Remarks			
(A)	Except:	nifests, Annual Reports, ion Reports, and all test s and analyses retained for st three years?	\checkmark	· ·					
(B)	Has the generator submitted Annual Reports and Exception Reports as required?								
	VII. INTERNATIONAL SHIPMENTS (Part 262, Subpart E)								
		e installation imported orted Hazardous Waste?		<u>~</u>	, 				
		(If answered Yes, complete the f	fo]]ov	wing as	s appli	cable.)			
		porting Hazardous waste, s a generator:		•					
	a.	Notified the Administrator in writing?							
	b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				·			
	с.	Met the Manifest requirements?							
		porting Hazardous Waste, s the generator:							
		Met the manifest requirements?							

TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

		• -	Yes	No	NI*	Remarks
	Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?		· /	•		
	<u>II.</u>	INTERNA	TIOINA	L SHI	PMENTS	
Α.	Does the transporter record on the manifest the date the waste left U.S.?	he the			<u>/</u>	NA
В.	Are signed completed manifest(s) on file?				1	· ————————————————————————————————————
	•	V. MI	SCELLA	NEOUS		
Α.	Does transporter transport hazardous waste into the U.S. from abroad?	•		1		
В.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		· <u>~</u>			
			- 			

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Petro-Chem Services Inc. is in the business of Cleaning out banges and tanks for various Industries. They will pump out remaining material for eventual reuse, and then wash out the tank or bange. They also are capable of responding to spills, and have the equip. for handling spills to the water and land. Their notification under RCRA was for the possibility that their cleaning solutions may at times be Hazardous, and due to the Spill work, it is likely they will be handling Hazardows waste, and temp. staring It at their facility while permits are applied for proper disposal. At their facility they will also be able to due some treatment (Separation, Filtration, Neutralization).